



MINISTRY OF JUSTICE  
Republic of Korea

Attorney General  
United States of America

RECEIVED  
2014 JUN -2 AM 10:11  
CRIMINAL DIVISION

**Request for Extradition of YOO Hyukkee, KIM Heakyung, KIM Pilbae**

I, HWANG Kyo-Ahn, the Korean Minister of Justice,

1. on behalf of the Republic of Korea, hereby request for the extradition of YOO Hyukkee, KIM Heakyung, KIM Pilbae for violating the Act on the Aggravated Punishment, etc. of Specific Economic Crimes (Embezzlement) under the Extradition Treaty between the Republic of Korea and the United States of America, so that this case can be handled in accordance with the relevant law of the Republic of Korea.

2. hereby confirm that the Korean Government certifies this supplementary document on the request for the extradition of the criminal by sealing, signing and impressing the official seal of the Korean Minister of Justice on this document.

Seoul, Republic of Korea

May 19, 2014

HWANG Kyo-Ahn  
Minister of Justice  
Republic of Korea  
(Sealed: Minister of Justice)

KIM Joo-Hyun  
Deputy Minister of Criminal Affairs Bureau  
(Duly authorized by the Minister)



## STATEMENT OF CONFIRMATION

I, JEONG Soon Shin, Prosecutor of the Incheon District Prosecutors' Office ("Incheon DPO") in Korea hereby certify the following in support of the request for the extradition of YOO Hyuk Kee from the United States of America to the Republic of Korea pursuant to the Extradition Treaty between the Republic of Korea and the United States of America, which became effective on December 20, 1999.

### 1. QUALIFICATIONS

1.1. I am a public prosecutor of the Incheon DPO under the Korean Ministry of Justice. After passing the National Bar Examination in 1995, I completed the two-year required program at the Judicial Research and Training Institute, an affiliate of the Supreme Court of Korea. In 1998, I obtained the qualifications to work as a judge, prosecutor, or lawyer in Korea. Since 2001, I have been working as a prosecutor under the appointment of the President of Korea. Based on my training, experience, and position, I clearly understand the criminal code and criminal procedures of Korea. As the prosecutor in charge of investigating this case, I am well aware of the matters of this case.

1.2. Under the Korean law, a prosecutor, who presides over investigation, may choose to either investigate independently or supervise the police as they investigate the case. Once the investigation is completed, the

prosecutor exclusively decides on the indictment. Thereafter, the prosecutor is in charge of maintaining the indictment and executing the final judgment of the court. According to the principle of the exclusive power of a prosecutor, the court may proceed with the trial procedures only for the cases indicted by a prosecutor. Furthermore, according to the Korean practice on investigation and indictment, a prosecutor does not indict a suspect without his custody. In this case, however, the suspect has not been indicted as his whereabouts has not been located.

## **2. INFORMATION ON YOO HYUK KEE**

- 2.1. YOO Hyuk Kee is a male citizen of the Republic of Korea who was born in Korea on November 10, 1972. His address in Korea is 616-5 Daemyeong-dong, Nam-gu, Daegu. He has a Korean passport numbered NY1001671. His English name is 'HYUK KEE YOO'.
- 2.2. Annex 1 is a genuine and exact copy of YOO Hyuk Kee's photograph submitted to the administrative agency for the issuance of his Resident Registration Card.
- 2.3. YOO Hyuk Kee is a permanent resident of the United States. On August 18, 2013, he departed for France and has not returned to Korea. He is currently presumed to be residing in the U.S.

## **3. PROGRESS OF THE CASE**

- 3.1. Background of Investigation

3.1.1. In the wake of the sinking of the 'Sewol Ferry' off the southwestern island of Jindo, Korea, on April 16, 2014, the Joint Investigation Team of Prosecutors and Police in Mokpo started investigating the captain and the officer of the ferry for their negligence during the operation of the ferry on the date of accident, and also Chonghaejin Marine Company ("Chonghaejin Marine"), the operator of the Sewol ferry, for violating its occupational duty of ship management.

3.1.2. In the above-mentioned investigation process, both the media and those who once worked for Semo Co., Ltd. ("Semo Group"), the holding company of Chonghaejin Marine, determined that the Sewol Ferry accident had been caused not only by the negligence committed by individuals such as the captain but also by structural problems resulting in a 'safety accident typical of underdeveloped countries,' including ① lack of transparency in Chonghaejin Marine and its affiliate companies and ② safety ignorance stemming from the desire of Chonghaejin Marine and its affiliate companies for reckless expansion, and they called for government-wide actions to prevent any future accidents of the same kind.

3.1.3. Under these circumstances, suspicions arose regarding the success of the head of Semo Group, YOO Byung Eyn, who had been arrested and sentenced to four years of imprisonment for habitual fraud against the followers of the church around 1995, but was able to restore his Group, owning around 50 affiliate companies with the total asset value

of approximately KRW 560,000,000,000 not long after he finished serving his sentence. After analyzing open-source information including audit reports and tax settlement documents of Semo Group's affiliate companies, reported to the Financial Supervisory Service, it was discovered that YOO Byung Eyn and his family managed the company without any transparency and in an undisclosed manner through a small number of close aides who had no expertise. Meanwhile, they had allegedly embezzled affiliate companies' assets frequently, and in order to commit such crimes, they had allegedly omitted legal decision-making processes, frequently provided unfair support to the affiliate companies and conducted self-dealings. After discovering the above, a full-scale investigation was launched.

### 3.2. Proceedings of Investigation

3.2.1. The Special Investigation Team conducted investigation on about 70 people including accountants KIM Chun-gyun and PARK Gwon-jong who audited the affiliate companies; GO Chang-hwan, the CEO of Semo Group; KIM Han-sik, the CEO of Chonghaejin Marine; SONG Guk-bin, the CEO of Dapanda Co., Ltd.; BYEON Gi-chun, the CEO of Chonhaiji Co., Ltd.; LEE Jae-yeong, the CEO of Ahae Co., Ltd.; KIM Gyeong-suk, the CEO of Noreunja Shopping Co., Ltd.; OH Gyeong-seok, the CEO of Hemato Centric Life Research Institute; PARK Seung-il, the auditor for I-One-I Holdings Co., Ltd.; and KIM Dong-hwan, the auditor for Dapanda Co., Ltd. The Special Investigation Team also checked the replies of the

affiliate companies to the Korea Financial Intelligence Unit and their transaction records for advisory fees, trademark royalties and payments for photographs made out to YOO Byung Eyn and his family.

3.2.2. As a result, it has been confirmed that YOO Byung Eyn, YOO Dae Kyoon, YOO Hyuk Kee, YOO Chong Somena, KIM Pil Bae, KIM Dong-hwan, PARK Seung-il, GO Chang-hwan, LEE Jae-yeong, and BYEON Gi-chun conspired to have the affiliate companies arbitrarily make payments out of their total sales to YOO Byung Eyn, YOO Chong Somena, YOO Dae Kyoon and YOO Hyuk Kee under various names such as business consulting fees, trademark royalties and payments for the purchase of photographs, and that it caused adverse effects on the yield structure of the affiliate companies.

3.2.3. From April 30, 2014 to May 8, 2014, the Special Investigation Team requested YOO Hyuk Kee to appear at the investigative agency through his attorney SON Byeong-gi three times, but he has failed to appear.

3.2.4. On May 8, 2014, the Special Investigation Team requested the Incheon District Court to issue an arrest warrant for YOO Hyuk Kee and Judge PARK Seong-yong of the above court issued the arrest warrant on the same day. Annex 2 is a genuine and exact copy of the arrest warrant issued by Judge PARK Seong-yong.

3.2.5. Currently, the Korean Office of US Homeland Security Investigations is providing cooperation in the investigation of this case.

#### **4. EXTRADITABLE CRIME AND RELEVANT EVIDENCE**

##### **4.1. Extraditable Crime**

YOO Hyuk Kee violated Article 3(1)1 and 3(1)2 of the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes and Article 355(1) of the Criminal Act(Embezzlement). The details of his crime are as follows.

##### **4.1.1. Holding 19.44% share of I-One-I Holdings Co., Ltd.**

(hereinafter referred to as 'I-One-I Holdings'), YOO Hyuk Kee has managed its affiliate companies such as Trigon Korea Co., Ltd., Gookje Yeongsang Co., Ltd., Dapanda Co., Ltd., Onzigoo Co., Ltd., Ahae Co., Ltd., Moonjin Media Co., Ltd., Chonhaiji Co., Ltd., Chonghaejin Marine Co., Ltd., Semo Co., Ltd., Clien Co., Ltd., Saemoori Co., Ltd., Hojin Co., Ltd., and Socuri Co., Ltd. Then, around November 28, 2005, YOO Hyuk Kee registered a private company named 'Key Solution' located at 1F 69-3 Cheongdam-dong, Gangnam-gu, Seoul, and acquired 'business consulting fees' personally in conspiracy with the CEOs of affiliate companies even though he did not provide business consulting to each affiliate company.

##### **4.1.2. Around March 2010, at the office of 'Semo' located at 558-10 and 565-3 Sipjeong-dong, Bupyeong-gu, Incheon, YOO Hyuk Kee conspired with CEO GO Chang-hwan of 'Semo' who was keeping the company funds for business purposes to sign a 'Business Consulting Service Contract' stating to the effect that KRW 25,000,000 should be paid by the victim company every month, even though the victim did not require regular business consulting for risk management,**

etc. and Key Solution managed by YOO Hyuk Kee was neither capable of offering business consulting service nor did it actually provide practical business consulting. Around that time, YOO Hyuk Kee received KRW 25,000,000 as a consulting fee into his Woori Bank account. Moreover, from then on to March 2014, YOO Hyuk Kee took KRW 25,000,000 every month, thereby embezzling a total of KRW 1,225,000,000 from the victim company.

4.1.3. Around April 2010, at the office of 'Moreal Design' located at 4-4 Samsung-dong, Gangnam-gu, Seoul, YOO Hyuk Kee conspired with CEO YOO Chong Somena of 'Moreal Design' who was keeping the company funds for business purposes to have the victim company pay him KRW 30,000,000 as a 'business consulting fee', even though the victim company did not require regular business consulting for risk management, etc. and Key Solution managed by YOO Hyuk Kee was neither capable of offering business consulting nor did it actually provide business consulting to 'Moreal Design'. Moreover, from then on to December 2013, YOO Hyuk Kee received KRW 20,000,000 or KRW 30,000,000 every month as a 'business consulting fee', thereby embezzling a total of KRW 990,000,000 from the victim company.

4.1.4. Around January 2009, at the office of 'Ahae', YOO Hyuk Kee conspired with CEO LEE Jae-yeong of 'Ahae' who was keeping the company funds for business purposes to draw up a contract stating to the effect that the victim company should pay 0.8%~1.6% of its monthly revenue to the suspect as a royalty payment for its trademark. Beforehand, YOO



Hyuk Kee registered the trademark of Ahae which had been used by the victim company for about ten years. Then, YOO Hyuk Kee received KRW 9,499,200, and from then on to December 2013, he took and embezzled a total of KRW 5,346,311,045 under the same pretext from the victim company.

4.1.5. Around January 2009, at the office of 'Onnara Shopping', YOO Hyuk Kee conspired with CEO BYEON Gi-chun of victim 'Onnara Shopping' who was keeping the company funds for business purposes to sign an 'Exclusive License Contract' for the trademark of 'Onnara Shopping' registered by the suspect, even though there is no brand value in the name, the trademark registration fee is about KRW 300,000 only and the name is quite replaceable. Then, YOO Hyuk Kee received KRW 8,514,430 from the victim, and from then on to December 2011, YOO Hyuk Kee received and embezzled a total of KRW 328,436,704.

4.1.6. Around January 2008, at the office of 'Chonhaiji', YOO Hyuk Kee conspired with CEO BYEON Gi-chun of 'Chonhaiji' who was keeping the company funds for business purposes to sign a contract stating to the effect that the victim company should pay 1.0%~1.5% of its revenue for using the trademark of 'Chonhaiji' registered by the suspect, even though there is no brand value in the name, the trademark registration fee is about KRW 300,000 only and the name is quite replaceable. Then, YOO Hyuk Kee received KRW 18,898,710 from the victim, and from then on to June 2010, YOO Hyuk Kee received and embezzled a total of KRW

1,235,426,771.

4.1.7. Around February 2011, at the office of 'Chonhaiji', YOO Hyuk Kee conspired with above BYEON Gi-chun to receive KRW 20,000,000 from the victim as an advisory fee even though he did not play any special role concerning the management of the victim company, and from then on to November 2011, YOO Hyuk Kee received monthly payment of KRW 20,000,000, thereby embezzling a total of KRW 200,000,000.

4.1.8. As suspect YOO Hyuk Kee needed a significant sum of money to exhibit photographs taken by his father YOO Byung Eyn at Chateau de Versailles, he decided to withdraw company funds from Chonhaiji. Around March 2013, at the office of 'Chonhaiji', YOO Hyuk Kee conspired with CEO BYEON Gi-chun of 'Chonhaiji' to have KRW 1,656,598,080 paid by the victim to a company in the US named Ahae Press Inc. represented by YOO Hyuk Kee as an advance payment for his father's photographs as if the victim had signed a contract to buy his photographs at a high price, even though his photographs were not proven to be priceless as they were never put up for sale in the auction market other than among followers of his church and affiliate companies. From then on to December 2013, YOO Hyuk Kee received and embezzled a total of KRW 19,862,077,987.

#### 4.2. Relevant Evidence

The evidence is sufficient to prosecute YOO Hyuk Kee pursuant to the Korean criminal laws on charge of

violating the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes (embezzlement).

- 4.2.1. Around April 26, 2014, at the Incheon DPO, KIM Chun-gyun made the following statements to prosecutor KIM Jeong-guk:
- "PARK Seung-il and KIM Dong-hwan established the management structure of affiliate companies for the YOO Byung Eyn family based on the advice received from outside. YOO Hyuk Kee favors PARK Seung-il and even said not to interfere with him in private." "Under the order of YOO Byung Eyn, each affiliate company raises funds using many excuses and the slush funds are transferred to the YOO Byung Eyn family via I-One-I Holdings Co., Ltd. They also restructure the corporate governance so as to better obtain such funds. PARK Seung-il frequently goes abroad with YOO Hyuk Kee because he is in charge of the management of funds in other countries. Every year, affiliate companies pay certain percentages of their revenues to SLPLUS (CEO: YOO Dae Kyoan) for consulting and the use of trademark; Moreal Design (CEO: YOO Chong Somena) for design service; Parrotbill (represented by YOO Byung Eyn) for consulting and the use of trademark; and Key Solution (CEO: YOO Hyuk Kee, the second son of YOO Byung Eyn) for consulting and the use of trademark. Dapanda also had to pay 2~3% of its revenues (approximately KRW 50,000,000,000), negatively affecting its yield structure." "I-One-I Holdings takes on the role of the audit team and collected the funds from affiliate companies. PARK Seung-il contacted the CEO of each

affiliate company and collected money whenever money is needed for YOO Byung Eyn's photograph exhibition, etc."

4.2.2. Around April 25, 2014, at the Incheon DPO, GO Chang-hwan made the following statements to prosecutor LEE Jin-ho: "Semo Group paid KRW 250,000,000 in 2010 and KRW 300,000,000 in 2011, 2012, and 2013 to Key Solution (CEO: YOO Hyuk Kee) as business consulting fees, upon request of PARK Seung-il of Key Solution." "I and PARK Seung-il decided on business consulting fee without having estimates from other companies compared and taking into account Key Solution's level of expertise, performance records, reliability, and the need for two-way consulting service, etc."

4.2.3. Around May 1, 2014, at the Incheon DPO, JO Seon-ae made the following statements to prosecutor CHOE won-seok: "Even though the Semo Group's financial statements indicate that its liability was higher than equity and its operating profit was on the decline, the company paid KRW 300,000,000 to Key Solution every year as a consulting service fee, adding up to KRW 1,150,000,000 in four years, which was excessive. Moreover, although the company's performance did not get any better even after having high-priced consulting service, the company did not replace the consulting firm. It was far from normal."

4.2.4. According to the payment records of Ahae, Semo Group, I-One-I Holdings, Dapanda, Moonjin Media, Chonhaiji, Chonghaejin Marine, Onnara Shopping and Moreal Design, each affiliate company made payments to YOO Byung Eyn and

his family.

4.2.5. The statements by KIM Chun-gyun, GO Chang-hwan, and JO Seon-ae were legitimately made in accordance with the procedures pursuant to the Criminal Procedure Act of the Republic of Korea, and documented and maintained at the Incheon DPO in charge of the investigation of this case. The evidence including financial transaction records of the payment statements of Ahae, Semo Group, I-One-I Holdings, Dapanda, Moonjin Media, Chonhaiji, Chonghaejin Marine, Onnara Shopping, and Moreal Design were legitimately gathered in accordance with the procedures pursuant to the Criminal Procedure Act of the Republic of Korea and kept in files together with the above-mentioned statements.

## **5. APPLICABLE LAW OF KOREA**

5.1. The applicable laws of Korea for the crime committed by YOO Hyuk Kee violating the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes (embezzlement) are as follows.

### **5.1.1. Embezzlement**

#### **Article 355(1) of the Criminal Act**

A person who, having the custody of another's property, embezzles or refuses to return it, shall be punished by imprisonment for not more than five years or by a fine not exceeding fifteen million won.

5.1.2. Violation of the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes (Embezzlement)

**Article 3(1)1 and 3(1)2 of the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes**

Any person who commits crimes as prescribed in Article 347 (fraud), 350 (extortion), 351 (limited to the habitual crime as prescribed in Articles 347 and 350), 355 (embezzlement, breach of trust) or 356 (occupational embezzlement, occupational breach of trust) of the Criminal Act, shall, if the value of the goods or profits on property which he gains or has another person gain is five hundred million won or more, be punished additionally as follows:

1. If the amount of profit is five billion won or more, he shall be punished by imprisonment for lifetime or not less than five years;
2. If the amount of profit is not less than five hundred million won but less than five billion won, he shall be punished by imprisonment for a definite term of three or more years;」

5.1.3. A person who commits embezzlement, if the amount of damages is five hundred million won or more, shall be subject to aggravated punishment pursuant to the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes.

5.1.4. Statute of Limitations

Under Article 249(1) of the Korean Criminal Procedure Act, the statute of limitations for crimes subject to lifetime imprisonment is fifteen (15) years. According to Article 253(3) of the Criminal Procedure Act, the statute of

limitations shall be suspended during the period for which the offender stays abroad for the purpose of avoiding criminal punishment. Therefore, the statute of limitations for KIM Pil Bae has not expired yet.

**Article 249(1) of the Criminal Procedure Act**

① The statute of limitations shall expire upon the lapse of the following terms:

1. Twenty-five years for crimes punishable with death penalty;
2. Fifteen years for crimes punishable with imprisonment without prison labor for life or imprisonment for life;
3. Ten years for crimes punishable with imprisonment or imprisonment without prison labor for a maximum term of ten years or more;
4. Seven years for crimes punishable with imprisonment or imprisonment without prison labor for a maximum term of less than ten years; and
5. Five years for crimes punishable with imprisonment or imprisonment without prison labor for a maximum term of less than five years, or suspension of qualifications for a maximum term of not less than ten years, or a fine

**Article 253(3) of the Criminal Procedure Act**

The limitation period shall be suspended during the period, for which an offender stays abroad for the purpose of escaping criminal punishment.

5.2. The aforementioned laws are currently in effect in Korea and were also effective between January 2008 and March 31, 2014 when YOO Hyuk Kee allegedly violated the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes (embezzlement).

## **6. Arrest Warrant**

6.1. As set forth above, an arrest warrant has been issued for YOO Hyuk Kee for violation of the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes.

6.2. In cases where it is difficult to prosecute a suspect on the run as it is in this case, the prosecution shall be suspended as a mid-step, and the prosecutor temporarily closes the investigation and seeks to have a warrant of arrest or detention for the suspect. With the arrest warrant issued, the prosecutor locates the whereabouts of the suspect and puts him on the wanted list so as to make the arrest. Therefore, when the prosecution is suspended due to the suspect's unknown whereabouts as in this case, neither prosecution to the court nor trial procedures proceeds so that there are no documents related to the indictment available in the case records.

6.3. Under the Criminal Procedure Act of the Republic of Korea, the prosecutor can request a relevant district judge to issue an arrest warrant to detain a suspect if there is sufficient evidence found during the investigation to believe that the suspect committed the crime; the suspect refuses to yield to a prosecutor's summons to appear; or



the suspect is likely to refuse such summons.

6.4. The judge will issue an arrest warrant only when it is determined that the request provides reasonable grounds for an arrest (Articles 201 and 201-2 of the *Criminal Procedure Act*). For this reason, the fact that an arrest warrant has been issued reflects that the judge is also convinced there are reasonable grounds to believe that the suspect committed the crime as described in the arrest warrant.

6.5. On May 8, 2014, Judge PARK Seong-yong of the Incheon District Court issued an arrest warrant for YOO Hyuk Kee upon my request. The arrest warrant, which will be valid until March 30, 2029, is a judicial document that grants the right to arrest YOO Hyuk Kee on or prior to March 30, 2029 for violating the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes. Judge PARK Seong-yong of the Incheon District Court has authority to issue such arrest warrant under the Korean law. The original arrest warrant is kept on the investigation file of this case for the relevant criminal procedures in Korea. I have reviewed the original in person and confirm that Annex 2 is a genuine and exact copy of the arrest warrant.

7. I hereby certify that the aforementioned are all true to my knowledge. I am submitting this statement of confirmation, being well-aware that I may be punished for falsely producing official documents pursuant to Article 227 of the *Criminal Act of Korea*.

May 14, 2014

Respectfully submitted by  
Prosecutor JEONG Soon Shin  
Incheon District Prosecutors' Office

Annex:

1. A genuine and exact copy of YOO Hyuk Kee's photograph
2. A genuine and exact copy of the arrest warrant for YOO Hyuk Kee



EX-YOO-00097

## Warrant of Arrest

Incheon District Court				
<b>Warrant No.</b>	2014-7383	<b>Criminal Offense</b>	Violation of the Act on the Aggravated Punishment Etc. of Specific Economic Crimes (Embezzlement)	
<b>Suspect</b>	<b>Name</b>	YOO Hyuk Kee	<b>Occupation</b>	Others
	<b>Resident Registration #</b>	721110-1691825	<b>Nationality</b>	Korean
	<b>Address</b>			
<b>Prosecutor</b>	JEONG Soon Shin	<b>Date of Application</b>	2014. 5. 8. 20:28	
<b>Defense Attorney</b>		<b>Date of Expiry</b>	2029. 3. 30	
<b>Facts of Crime</b>	See Enclosure	<b>Place of Custody</b>	Incheon District Prosecutors' Office	
<b>Place of Detention</b>	Incheon Detention Center			
<input checked="" type="checkbox"/> The suspect failed to attend in accordance with the summons served on him/her without a plausible reason.  <input type="checkbox"/> The suspect may fail to attend in accordance with the summons served on him/her, without a plausible reason.		As there is sufficient reason to believe that the defendant has committed the offense(s) set out in the attachment and there is ground for his/her arrest, the defendant shall be arrested and brought to court. If this warrant is not enforced on or before the date of expiry, it shall no longer be enforceable and the warrant shall be returned.  <div style="text-align: right;">2014. 5. 8.</div>  <div style="text-align: right;">Judge PARK Seong-yong (<i>sealed</i>)</div>		
<input type="checkbox"/> The suspect has no fixed address (for crimes resulting in a fine not exceeding KRW 500,000, detention, or a minor fine).				
<b>Date of Arrest</b>		<b>Place of Arrest</b>		
<b>Date of Custody</b>		<b>Place of Custody</b>		
<b>Date of Detention</b>		<b>Place of Detention</b>		
<b>Reasons for Failed Execution</b>				
<b>Office/Title of Person in Charge</b>		<b>Signature of Person in Charge</b>		

## **Facts of Crime**

### **1. Information on the Suspect**

Suspect YOO Hyuk Kee is the son of YOO Byung Eyn who is leading the Evangelical Baptist Church. Holding 19.44% share of I-One-I Holdings Co., Ltd. (hereinafter referred to as 'I-One-I Holdings'), YOO Hyuk Kee has managed its affiliate companies such as Trigon Korea Co., Ltd., Gookje Yeongsang Co., Ltd., Dapanda Co., Ltd., Onzigoo Co., Ltd., Ahae Co., Ltd., Moonjin Media Co., Ltd., Chonhaiji Co., Ltd., Chonghaejin Marine Co., Ltd., Semo Co., Ltd., Clien Co., Ltd., Saemoori Co., Ltd., Hojin Co., Ltd., and Socuri Co., Ltd. Then, around November 28, 2005, YOO Hyuk Kee registered a private company named 'Key Solution' located at 1F 69-3 Cheongdam-dong, Gangnam-gu, Seoul, and then provided business consulting to each affiliate company so as to acquire 'business consulting fees' personally in conspiracy with the CEOs of affiliate companies.

### **2. Facts of Crime**

#### **A. Violation of the Act on the Aggravated Punishment Etc. of Specific Economic Crimes (Embezzlement) against victim Semo Co., Ltd. ('Semo')**

Around March 2010, at the office of 'Semo' located at 558-10 and 565-3 Sipjeong-dong, Bupyeong-gu, Incheon, suspect YOO Hyuk Kee conspired with CEO GO Chang-hwan of 'Semo' who was keeping the company funds for business purposes to sign a 'Business Consulting Service Contract' stating to the effect that KRW 25,000,000 should be paid by the victim company every month, even though the victim did not require regular business consulting for risk management, etc. and Key Solution managed by YOO Hyuk Kee was neither capable of offering business consulting service nor did it actually provide practical business consulting. Around that time, YOO Hyuk Kee received

KRW 25,000,000 as a consulting fee into his Woori Bank account. Moreover, from then on to March 2014, YOO Hyuk Kee took KRW 25,000,000 every month as listed in the attached Accounts of Crime (1), thereby embezzling a total of KRW 1,225,000,000 from the victim company.

**B. Violation of the Act on the Aggravated Punishment Etc. of Specific Economic Crimes (Embezzlement) against victim Moreal Design Inc. ('Moreal Design')**

Around April 2010, at the office of 'Moreal Design' located at 4-4 Samsung-dong, Gangnam-gu, Seoul, suspect YOO Hyuk Kee conspired with CEO YOO Chong Somena of 'Moreal Design' who was keeping the company funds for business purposes to have the victim company pay him KRW 30,000,000 as a 'business consulting fee', even though the victim company did not require regular business consulting for risk management, etc. and Key Solution managed by YOO Hyuk Kee was neither capable of offering business consulting nor did it actually provide business consulting to 'Moreal Design'. Moreover, from then on to December 2013, YOO Hyuk Kee received KRW 20,000,000 or KRW 30,000,000 every month as a 'business consulting fee' as listed in the attached Accounts of Crime (2), thereby embezzling a total of KRW 990,000,000 from the victim company.

**C. Violation of the Act on the Aggravated Punishment Etc. of Specific Economic Crimes (Embezzlement) against victim Ahae Co., Ltd. ('Ahae')**

Around January 2009, at the office of 'Ahae', suspect YOO Hyuk Kee conspired with CEO LEE Jae-yeong of 'Ahae' who was keeping the company funds for business purposes to draw up a contract stating to the effect that the victim company should pay 0.8%~1.6% of its monthly revenue to the suspect as a royalty payment for its trademark. Beforehand, YOO Hyuk Kee registered the trademark of Ahae which had been used by

the victim company for about ten years. Then, YOO Hyuk Kee received KRW 9,499,200, and from then on to December 2013, he took and embezzled a total of KRW 5,346,311,045 under the same pretext from the victim company as listed in the attached Accounts of Crime (3).

**D. Occupational embezzlement against victim Onnara Shopping Co., Ltd. ('Onnara Shopping')**

Around January 2009, at the office of 'Onnara Shopping', suspect YOO Hyuk Kee conspired with CEO BYEON Gi-chun of victim 'Onnara Shopping' who was keeping the company funds for business purposes to sign an 'Exclusive License Contract' for the trademark of 'Onnara Shopping' registered by the suspect, even though there is no brand value in the name, the trademark registration fee is about KRW 300,000 only and the name is quite replaceable. Then, YOO Hyuk Kee received KRW 8,514,430 from the victim, and from then on to December 2011, YOO Hyuk Kee received and embezzled a total of KRW 328,436,704 as listed in the attached Accounts of Crime (4).

**E. Violation of the Act on the Aggravated Punishment Etc. of Specific Economic Crimes (Embezzlement) against victim Chonhaiji Co., Ltd. ('Chonhaiji')**

**(1) Embezzlement of Trademark Royalties**

Around January 2008, at the office of 'Chonhaiji', suspect YOO Hyuk Kee conspired with CEO BYEON Gi-chun of 'Chonhaiji' who was keeping the company funds for business purposes to sign a contract stating to the effect that the victim company should pay 1.0%~1.5% of its revenue for using the trademark of 'Chonhaiji' registered by the suspect, even though there is no brand value in the name, the trademark registration fee is about KRW 300,000 only and the name is quite replaceable. Then, YOO Hyuk Kee received KRW 18,898,710 from the victim, and from then on to June 2010, YOO Hyuk

Kee received and embezzled a total of KRW 1,235,426,771 as listed in the attached Accounts of Crime (5).

**(2) Embezzlement of Advisory Fees**

Around February 2011, at the office of 'Chonhaiji', suspect YOO Hyuk Kee conspired with above BYEON Gi-chun to receive KRW 20,000,000 from the victim as an advisory fee even though he did not play any special role concerning the management of the victim company, and from then on to November 2011, YOO Hyuk Kee received monthly payment of KRW 20,000,000, thereby embezzling a total of KRW 200,000,000 as listed in the attached Accounts of Crime (6).

**(3) Embezzlement of Advance Payments for Photographs**

As suspect YOO Hyuk Kee needed a significant sum of money to exhibit photographs taken by his father YOO Byung Eyn at Chateau de Versailles, he decided to withdraw company funds from Chonhaiji Co., Ltd.

Around March 2013, at the office of 'Chonhaiji', YOO Hyuk Kee conspired with CEO BYEON Gi-chun of 'Chonhaiji' to have KRW 1,656,598,080 paid by the victim to a company in the US named Ahae Press Inc. represented by YOO Hyuk Kee as an advance payment for his father's photographs as if the victim had signed a contract to buy his photographs at a high price, even though his photographs were not proven to be priceless as they were never put up for sale in the auction market other than among followers of his church and affiliate companies. From then on to December 2013, YOO Hyuk Kee received and embezzled a total of KRW 19,862,077,987 as listed in the attached Accounts of Crime (7).



## ACCOUNTS OF CRIME (1)

NO.	DATE	PAYER	CEO	RECIPIENT	AMOUNT OF EMBEZZLEMENT (Excluding VAT)	DETAILS	REMARKS
1	2010-03-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
2	2010-04-30	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
3	2010-05-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
4	2010-06-30	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
5	2010-07-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
6	2010-08-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
7	2010-09-30	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
8	2010-11-01	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
9	2010-11-30	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
10	2010-12-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
11	2011-01-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
12	2011-02-28	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
13	2011-03-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
14	2011-04-30	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
15	2011-05-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
16	2011-06-30	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
17	2011-07-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
18	2011-08-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
19	2011-09-30	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
20	2011-10-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
21	2011-11-30	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
22	2011-12-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
23	2012-01-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
24	2012-02-29	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	

25	2012-03-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
26	2012-04-30	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
27	2012-05-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
28	2012-06-30	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
29	2012-07-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
30	2012-08-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
31	2012-09-30	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
32	2012-10-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
33	2012-11-30	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
34	2012-12-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
35	2013-01-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
36	2013-02-28	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
37	2013-03-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
38	2013-04-30	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
39	2013-05-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
40	2013-06-30	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
41	2013-07-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
42	2013-08-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
43	2013-09-30	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
44	2013-01-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
45	2013-11-30	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
46	2013-12-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
47	2014-01-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
48	2014-02-29	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
49	2014-03-31	Semo Co., Ltd.	GO Chang-hwan	Key Solution	25,000,000	Business Consulting Service Fee	
Total				KRW 1,225,000,000			

## ACCOUNTS OF CRIME (2)

NO.	DATE	PAYER	CEO	RECIPIENT	AMOUNT OF EMBEZZLEMENT (Excluding VAT)	DETAILS	REMARKS
1	2010-04-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	30,000,000	Business Consulting Service Fee	
2	2010-05-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	30,000,000	Business Consulting Service Fee	
3	2010-06-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	30,000,000	Business Consulting Service Fee	
4	2010-07-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	30,000,000	Business Consulting Service Fee	
5	2010-08-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	30,000,000	Business Consulting Service Fee	
6	2010-09-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	30,000,000	Business Consulting Service Fee	
7	2010-10-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	30,000,000	Business Consulting Service Fee	
8	2010-11-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	30,000,000	Business Consulting Service Fee	
9	2010-12-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	30,000,000	Business Consulting Service Fee	
10	2011-01-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
11	2011-02-28	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
12	2011-03-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
13	2011-04-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
14	2011-05-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
15	2011-06-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
16	2011-07-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
17	2011-08-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	

			hwa				
18	2011-09-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
19	2011-10-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
20	2011-11-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
21	2011-12-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
22	2012-01-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
23	2012-02-29	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
24	2012-03-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
25	2012-04-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
26	2012-05-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
27	2012-06-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
28	2012-07-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
29	2012-08-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
30	2012-09-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
31	2012-10-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
32	2012-11-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
33	2012-12-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
34	2013-01-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	

35	2013-02-28	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
36	2013-03-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
37	2013-04-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
38	2013-05-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
39	2013-06-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
40	2013-07-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
41	2013-08-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
42	2013-09-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
43	2013-10-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
44	2013-11-30	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
45	2013-12-31	Moreal Design Inc.	YOO Chong Somena HA Myeong-hwa	Key Solution	20,000,000	Business Consulting Service Fee	
Total				KRW 990,000,000			

### ACCOUNTS OF CRIME (3)

NO.	DATE	PAYER	CEO	RECIPIENT	AMOUNT OF EMBEZZLEMENT (Excluding VAT)	DETAILS	REMARKS
1	2009-01-30	Ahae Co., Ltd.	LEE Seong-hwan LEE Jae-yeong	Key Solution	9,499,200	Trademark royalty	
2	2009-02-27	Ahae Co., Ltd.	LEE Seong-hwan LEE Jae-yeong	Key Solution	18,685,600	Trademark royalty	
3	2009-03-31	Ahae Co., Ltd.	LEE Seong-hwan LEE Jae-yeong	Key Solution	52,638,400	Trademark royalty	
4	2009-04-30	Ahae Co., Ltd.	LEE Seong-hwan LEE Jae-yeong	Key Solution	62,902,300	Trademark royalty	
5	2009-05-30	Ahae Co., Ltd.	LEE Seong-hwan LEE Jae-yeong	Key Solution	49,325,900	Trademark royalty	
6	2009-06-30	Ahae Co., Ltd.	LEE Seong-hwan LEE Jae-yeong	Key Solution	59,522,800	Trademark royalty	
7	2009-07-31	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	65,986,900	Trademark royalty	
8	2009-08-31	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	74,332,910	Trademark royalty	
9	2009-09-30	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	85,358,950	Trademark royalty	
10	2009-10-30	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	82,482,640	Trademark royalty	
11	2009-11-30	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	75,699,660	Trademark royalty	
12	2009-12-31	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	65,440,520	Trademark royalty	
13	2010-01-30	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	20,057,030	Trademark royalty	
14	2010-02-27	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	34,552,840	Trademark royalty	
15	2010-03-31	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	98,678,620	Trademark royalty	
16	2010-04-30	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	113,957,210	Trademark royalty	
17	2010-05-31	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	108,965,880	Trademark royalty	
18	2010-06-30	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	119,595,560	Trademark royalty	
19	2010-07-30	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	91,733,660	Trademark royalty	
20	2010-08-31	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	57,267,790	Trademark royalty	

21	2010-09-30	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	68,028,360	Trademark royalty	
22	2010-10-29	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	88,509,320	Trademark royalty	
23	2010-11-30	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	92,307,510	Trademark royalty	
24	2010-12-31	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	67,265,320	Trademark royalty	
25	2011-01-31	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	28,770,020	Trademark royalty	
26	2011-02-28	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	37,212,960	Trademark royalty	
27	2011-03-31	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	86,113,660	Trademark royalty	
28	2011-04-29	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	119,011,700	Trademark royalty	
29	2011-05-31	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	114,268,060	Trademark royalty	
30	2011-06-29	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	125,344,540	Trademark royalty	
31	2011-07-29	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	97,473,630	Trademark royalty	
32	2011-08-31	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	95,052,150	Trademark royalty	
33	2011-09-30	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	118,644,650	Trademark royalty	
34	2011-10-31	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	117,824,120	Trademark royalty	
35	2011-11-30	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	112,252,300	Trademark royalty	
36	2011-12-30	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	105,125,510	Trademark royalty	
37	2012-01-31	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	32,865,670	Trademark royalty	
38	2012-02-29	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	54,586,090	Trademark royalty	
39	2012-03-31	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	99,416,630	Trademark royalty	
40	2012-04-30	Ahae Co., Ltd.	LEE Gang-se LEE Jae-yeong	Key Solution	126,176,930	Trademark royalty	
41	2012-05-31	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	153,315,540	Trademark royalty	
42	2012-06-30	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	152,717,850	Trademark royalty	
43	2012-07-31	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	88,316,150	Trademark royalty	

44	2012-09-31	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	71,302,970	Trademark royalty	
45	2012-09-30	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	109,726,550	Trademark royalty	
46	2012-11-12	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	117,211,055	Trademark royalty	
47	2012-11-30	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	117,887,270	Trademark royalty	
48	2012-12-31	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	67,798,940	Trademark royalty	
49	2013-01-31	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	29,444,940	Trademark royalty	
50	2013-02-28	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	96,207,690	Trademark royalty	
51	2013-03-31	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	104,114,570	Trademark royalty	
52	2013-04-30	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	135,741,050	Trademark royalty	
53	2013-05-31	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	140,537,280	Trademark royalty	
54	2013-06-30	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	134,883,620	Trademark royalty	
55	2013-07-31	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	95,969,170	Trademark royalty	
56	2013-08-30	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	97,998,480	Trademark royalty	
57	2013-09-30	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	99,694,710	Trademark royalty	
58	2013-10-31	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	116,803,180	Trademark royalty	
59	2013-11-30	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	131,752,960	Trademark royalty	
60	2013-12-31	Ahae Co., Ltd.	LEE Jae-yeong HWANG Won-ju	Key Solution	151,053,570	Trademark royalty	
Total				KRW 5,346,311,045			



### ACCOUNTS OF CRIME (4)

NO.	DATE	PAYER	CEO	RECIPIENT	AMOUNT OF EMBEZZLEMENT (Excluding VAT)	DETAILS	REMARKS
1	2009-01-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	8,514,430	Trademark royalty	
2	2009-02-28	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	8,387,180	Trademark royalty	
3	2009-03-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	10,049,271	Trademark royalty	
4	2009-04-30	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	8,911,148	Trademark royalty	
5	2009-05-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	8,944,341	Trademark royalty	
6	2009-06-30	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	9,369,197	Trademark royalty	
7	2009-07-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	9,339,334	Trademark royalty	
8	2009-08-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	9,194,022	Trademark royalty	
9	2009-09-30	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	11,251,062	Trademark royalty	
10	2009-10-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	10,081,781	Trademark royalty	
11	2009-11-30	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	11,411,741	Trademark royalty	
12	2009-12-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	11,631,725	Trademark royalty	
13	2010-01-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	11,077,274	Trademark royalty	
14	2010-02-28	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	9,646,549	Trademark royalty	
15	2010-03-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	11,053,410	Trademark royalty	
16	2010-04-30	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	11,104,935	Trademark royalty	
17	2010-05-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	11,336,950	Trademark royalty	
18	2010-06-30	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	11,248,907	Trademark royalty	
19	2010-07-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	10,724,209	Trademark royalty	
20	2010-08-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	10,668,041	Trademark royalty	
21	2010-09-30	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	9,475,317	Trademark royalty	
22	2010-10-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	10,402,170	Trademark royalty	
23	2010-11-30	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	9,953,442	Trademark royalty	
24	2010-12-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	9,386,467	Trademark royalty	

25	2011-01-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	9,153,436	Trademark royalty	
26	2011-02-28	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	5,693,324	Trademark royalty	
27	2011-03-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	8,382,828	Trademark royalty	
28	2011-04-30	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	6,747,077	Trademark royalty	
29	2011-05-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	7,476,739	Trademark royalty	
30	2011-06-30	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	7,234,918	Trademark royalty	
31	2011-07-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	7,281,819	Trademark royalty	
32	2011-08-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	6,729,200	Trademark royalty	
33	2011-09-30	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	7,084,049	Trademark royalty	
34	2011-10-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	6,179,764	Trademark royalty	
35	2011-11-30	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	6,690,886	Trademark royalty	
36	2011-12-31	Onnara Shopping Co., Ltd.	BYEON Gi-chun	Key Solution	6,619,761	Trademark royalty	
Total				KRW 328,436,704			

## ACCOUNTS OF CRIME (5)

NO.	DATE	PAYER	CEO	RECIPIENT	AMOUNT OF EMBEZZLEMENT (Excluding VAT)	DETAILS	REMARKS
1	2008-01-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	18,898,710	Trademark royalty	
2	2008-02-29	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	19,065,190	Trademark royalty	
3	2008-03-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	22,695,580	Trademark royalty	
4	2008-04-30	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	21,061,470	Trademark royalty	
5	2008-05-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	27,193,951	Trademark royalty	
6	2008-06-30	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	20,423,502	Trademark royalty	
7	2008-07-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	26,326,392	Trademark royalty	
8	2008-08-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	20,492,939	Trademark royalty	
9	2008-09-30	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	22,261,413	Trademark royalty	
10	2008-10-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	23,884,376	Trademark royalty	
11	2008-11-30	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	32,453,666	Trademark royalty	
12	2008-12-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	30,486,812	Trademark royalty	
13	2009-01-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	48,111,860	Trademark royalty	
14	2009-02-28	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	50,410,799	Trademark royalty	
15	2009-03-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	60,588,197	Trademark royalty	
16	2009-04-30	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	58,348,572	Trademark royalty	
17	2009-05-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	54,578,526	Trademark royalty	
18	2009-06-30	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	64,037,212	Trademark royalty	
19	2009-07-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	59,809,228	Trademark royalty	
20	2009-08-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	53,707,361	Trademark royalty	
21	2009-09-30	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	63,522,079	Trademark royalty	
22	2009-10-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	58,962,850	Trademark royalty	
23	2009-11-30	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	64,268,957	Trademark royalty	
24	2009-12-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	57,277,573	Trademark royalty	

25	2010-01-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	52,761,859	Trademark royalty	
26	2010-02-28	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	35,350,717	Trademark royalty	
27	2010-03-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	51,082,683	Trademark royalty	
28	2010-04-30	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	45,397,219	Trademark royalty	
29	2010-05-31	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	38,288,632	Trademark royalty	
30	2010-06-30	Chonhaiji Co., Ltd.	SIN Jae-jik	Key Solution	33,678,446	Trademark royalty	
Total				KRW 1,235,426,771			

### ACCOUNTS OF CRIME (6)

NO.	DATE	PAYER	CEO	RECIPIENT	AMOUNT OF EMBEZZLEMENT (Excluding VAT)	DETAILS	REMARKS
1	2011-02-25	Chonhaiji Co., Ltd.	BYEON Gi-chun	YOO Hyuk Kee	20,000,000	Advisory fee	
2	2011-03-25	Chonhaiji Co., Ltd.	BYEON Gi-chun	YOO Hyuk Kee	20,000,000	Advisory fee	
3	2011-04-21	Chonhaiji Co., Ltd.	BYEON Gi-chun	YOO Hyuk Kee	20,000,000	Advisory fee	
4	2011-05-24	Chonhaiji Co., Ltd.	BYEON Gi-chun	YOO Hyuk Kee	20,000,000	Advisory fee	
5	2011-06-22	Chonhaiji Co., Ltd.	BYEON Gi-chun	YOO Hyuk Kee	20,000,000	Advisory fee	
6	2011-07-22	Chonhaiji Co., Ltd.	BYEON Gi-chun	YOO Hyuk Kee	20,000,000	Advisory fee	
7	2011-08-24	Chonhaiji Co., Ltd.	BYEON Gi-chun	YOO Hyuk Kee	20,000,000	Advisory fee	
8	2011-09-21	Chonhaiji Co., Ltd.	BYEON Gi-chun	YOO Hyuk Kee	20,000,000	Advisory fee	
9	2011-10-20	Chonhaiji Co., Ltd.	BYEON Gi-chun	YOO Hyuk Kee	20,000,000	Advisory fee	
10	2011-11-22	Chonhaiji Co., Ltd.	BYEON Gi-chun	YOO Hyuk Kee	20,000,000	Advisory fee	
Total				KRW 200,000,000			

## ACCOUNTS OF CRIME (7)

NO.	DATE	TITLE OF ACCOUNT	AMOUNT	DETAILS
1	2013-03-27	Advance Payment	1,656,598,080	Photographs purchased by AHAE PRESS
2	2013-04-23	Advance Payment	685,374,652	Photographs purchased by AHAE PRESS
3	2013-04-25	Advance Payment	700,000,000	Photographs purchased by AHAE PRESS
4	2013-04-25	Advance Payment	299,091,725	Photographs purchased by AHAE PRESS
5	2013-05-24	Advance Payment	790,290,933	Photographs purchased by AHAE PRESS
6	2013-05-24	Advance Payment	5,000	Photographs purchased by AHAE PRESS
7	2013-05-31	Advance Payment	314,315,268	Photographs purchased by AHAE PRESS
8	2013-06-07	Advance Payment	1,113,651,704	Photographs purchased by AHAE PRESS
9	2013-06-21	Advance Payment	1,000,000,000	Photographs purchased by AHAE PRESS
10	2013-06-21	Advance Payment	581,561,566	Photographs purchased by AHAE PRESS
11	2013-07-12	Advance Payment	500,539,850	Photographs purchased by AHAE PRESS
12	2013-07-19	Advance Payment	626,008,934	Photographs purchased by AHAE PRESS
13	2013-07-19	Advance Payment	47,236,932	Photographs purchased by AHAE PRESS
14	2013-07-25	Advance Payment	813,514,580	Photographs purchased by AHAE PRESS
15	2013-07-26	Advance Payment	111,403,702	Photographs purchased by AHAE PRESS
16	2013-07-26	Advance Payment	188,598,824	Photographs purchased by AHAE PRESS
17	2013-07-26	Advance Payment	329,814,674	Photographs purchased by AHAE PRESS
18	2013-08-09	Advance Payment	979,549,055	Photographs purchased by AHAE PRESS
19	2013-08-09	Advance Payment	338,055,955	Photographs purchased by AHAE PRESS
20	2013-08-09	Advance Payment	267,759,760	Photographs purchased by AHAE PRESS
21	2013-08-23	Advance Payment	1,683,201,831	Photographs purchased by AHAE PRESS
22	2013-09-05	Advance Payment	1,095,051,425	Photographs purchased by AHAE PRESS
23	2013-09-24	Advance Payment	398,541,155	Photographs purchased by AHAE PRESS
24	2013-09-30	Advance Payment	539,051,170	Photographs purchased by AHAE PRESS

25	2013-10-07	Advance Payment	600,050,876	Photographs purchased by AHAE PRESS
26	2013-10-17	Advance Payment	515,534,174	Photographs purchased by AHAE PRESS
27	2013-10-28	Advance Payment	105,016,992	Photographs purchased by AHAE PRESS
28	2013-10-28	Advance Payment	41,979,008	Photographs purchased by AHAE PRESS
29	2013-10-29	Advance Payment	212,890,963	Photographs purchased by AHAE PRESS
30	2013-10-29	Advance Payment	161,628,542	Photographs purchased by AHAE PRESS
31	2013-10-29	Advance Payment	131,338,916	Photographs purchased by AHAE PRESS
32	2013-11-07	Advance Payment	88,019,975	Photographs purchased by AHAE PRESS
33	2013-11-07	Advance Payment	7,391,280	Photographs purchased by AHAE PRESS
34	2013-11-07	Advance Payment	171,855,800	Photographs purchased by AHAE PRESS
35	2013-11-21	Advance Payment	156,989,532	Photographs purchased by AHAE PRESS
36	2013-11-21	Advance Payment	106,371,948	Photographs purchased by AHAE PRESS
37	2013-11-22	Advance Payment	106,441,958	Photographs purchased by AHAE PRESS
38	2013-12-11	Advance Payment	370,572,219	Photographs purchased by AHAE PRESS
39	2013-12-11	Advance Payment	261,334,030	Photographs purchased by AHAE PRESS
40	2013-12-11	Advance Payment	63,930,030	Photographs purchased by AHAE PRESS
41	2013-12-11	Advance Payment	40,706,030	Photographs purchased by AHAE PRESS
42	2013-12-16	Advance Payment	21,670,030	Photographs purchased by AHAE PRESS
43	2013-12-23	Advance Payment	894,982,649	Photographs purchased by AHAE PRESS
44	2013-12-24	Advance Payment	744,156,260	Photographs purchased by AHAE PRESS
Total KRW 19,862,077,987				

## STATEMENT OF CONFIRMATION

I, JEONG Soon Shin, Prosecutor of the Incheon Central District Prosecutors' Office ("Incheon DPO") in Korea hereby certify the following in support of the request for the extradition of KIM Heakyung from the United States of America to the Republic of Korea pursuant to the Extradition Treaty between the Republic of Korea and the United States of America, which became effective on December 20, 1999.

### 1. QUALIFICATIONS

- 1.1. I am a public prosecutor of the Incheon DPO under the Korean Ministry of Justice. After passing the National Bar Examination in 1995, I completed the two-year required program at the Judicial Research and Training Institute, an affiliate of the Supreme Court of Korea. In 1998, I obtained the qualifications to work as a judge, prosecutor, or lawyer in Korea. Since 2001, I have been working as a prosecutor under the appointment of the President of Korea. Based on my training, experience, and position, I clearly understand the criminal code and criminal procedures of Korea. As the prosecutor in charge of investigating this case, I am well aware of the matters of this case.
- 1.2. Under the Korean law, a prosecutor, who presides over investigation, may choose to either investigate independently or supervise the police as they investigate the case. Once the investigation is completed, the



prosecutor exclusively decides on the indictment. Thereafter, the prosecutor is in charge of maintaining the indictment and executing the final judgment of the court. According to the principle of the exclusive power of a prosecutor, the court may proceed with the trial procedures only for the cases indicted by a prosecutor. Furthermore, according to the Korean practice on investigation and indictment, a prosecutor does not indict a suspect without her custody. In this case, however, the suspect has not been indicted as her whereabouts has not been located.

## **2. INFORMATION ON KIM HEAKYUNG**

- 2.1. KIM Heakyung is a female citizen of the Republic of Korea who was born in Korea on December 10, 1962. Her address in Korea is 1000 Hyeondeok-ro Hyeondeok-myeon, Pyeongtaek-si, Gyeonggi-do. She holds a Korean passport numbered M97023769. Her name in English is 'HEAKYUNG KIM'.
- 2.2. Annex 1 is a genuine and exact copy of KIM Heakyung's photograph, submitted to the administrative agency for the issuance of her Resident Registration Card.
- 2.3. On March 27, 2014, KIM Heakyung left for the United States and has not come back to Korea. It has been confirmed that she currently resides in the United States.

## **3. PROGRESS OF THE CASE**

- 3.1. Background of Investigation

- 3.1.1. In the wake of the sinking of the 'Sewol Ferry' off the southwestern island of Jindo, Korea, on April 16, 2014, the Joint Investigation Team of Prosecutors and Police in Mokpo started investigating the captain and the officer of the ferry for their negligence during the operation of the ferry on the date of accident, and also Chonghaejin Marine Company ("Chonghaejin Marine"), the operator of the Sewol ferry, for violating its occupational duty of ship management.
- 3.1.2. In the above-mentioned investigation process, both the media and those who once worked for Semo Co., Ltd. ("Semo Group"), the holding company of Chonghaejin Marine, determined that the Sewol Ferry accident had been caused not only by the negligence committed by individuals such as the captain but also by structural problems resulting in a 'safety accident typical of underdeveloped countries,' including ① lack of transparency in Chonghaejin Marine and its affiliate companies and ② safety ignorance stemming from the desire of Chonghaejin Marine and its affiliate companies for reckless expansion, and they called for government-wide actions to prevent any future accidents of the same kind.
- 3.1.3. Under these circumstances, suspicions arose regarding the success of the head of Semo Group, YOO Byung Eyn, who had been arrested and sentenced to four years of imprisonment for habitual fraud against the followers of the church around 1995, but was able to restore his Group, owning around 50 affiliate companies with the total asset value

of approximately KRW 560,000,000,000 not long after he finished serving his sentence. After analyzing open-source information including audit reports and tax settlement documents of Semo Group's affiliate companies, reported to the Financial Supervisory Service, it was discovered that YOO Byung Eyn and his family managed the company without any transparency and in an undisclosed manner through a small number of close aides who had no expertise. Meanwhile, they had allegedly embezzled affiliate companies' assets frequently, and in order to commit such crimes, they had allegedly omitted legal decision-making processes, frequently provided unfair support to the affiliate companies and conducted self-dealings. After discovering the above, a full-scale investigation was launched.

### 3.2. Proceedings of Investigation

3.2.1. The Special Investigation Team conducted investigation on about 70 people including accountants KIM Chun-gyun and PARK Gwon-jong who audited the affiliate companies; GO Chang-hwan, the CEO of Semo Group; KIM Han-sik, the CEO of Chonghaejin Marine; SONG Guk-bin, the CEO of Dapanda Co., Ltd.; BYEON Gi-chun, the CEO of Chonhaiji Co., Ltd.; LEE Jae-yeong, the CEO of Ahae Co., Ltd.; KIM Gyeong-suk, the CEO of Noreunja Shopping Co., Ltd.; OH Gyeong-seok, the CEO of Hemato Centric Life Research Institute; PARK Seung-il, the auditor for I-One-I Holdings Co., Ltd.; and KIM Dong-hwan, the auditor for Dapanda Co., Ltd. The Special Investigation Team also checked the replies of the

affiliate companies to the Korea Financial Intelligence Unit; their transaction records for advisory fees, trademark royalties and payments for photographs made out to YOO Byung Eyn and his family; and the current record of real estates possessed by KIM Heakyung.

3.2.2. As a result, it has been confirmed that KIM Heakyung purchased real estates, on 90 different occasions, using the money of Evangelical Baptist Church which was kept by KIM Heakyung.

3.2.3. From April 30, 2014 to May 8, 2014, the Special Investigation Team requested KIM Heakyung to appear at the investigative agency through her mother CHOI Yeong-soon three times, but she has failed to appear.

3.2.4. Accordingly, on May 8, 2014, the Special Investigation Team requested the Incheon District Court to issue an arrest warrant for KIM Heakyung, and Judge PARK Seong-yong of the above court issued the arrest warrant on the same day. Annex 2 is a genuine and exact copy of the arrest warrant issued by Judge PARK Seong-yong.

3.2.5. Currently, the Korean Office of US Homeland Security Investigations is providing cooperation in the investigation of this case.

#### **4. EXTRADITABLE CRIME AND RELEVANT EVIDENCE**

##### **4.1. Extraditable Crime**

KIM Heakyung violated Article 3(1)-1 of the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes, and Article 355(1) (embezzlement) of the Criminal Act. The details of crime are as follows.

4.1.1. Suspect KIM Heakyung is close to YOO Byung Eyn who is leading the 'Evangelical Baptist Church.' KIM Heakyung holds 6.29% share of I-One-I Holdings Co., Ltd. (hereinafter 'I-One-I Holdings') which is the holding company of 'Semo Group', and 24.4% share of Dapanda Co., Ltd. (hereinafter 'Dapanda') which is one of major affiliate companies. She has served as the CEO of Hankook Pharmaceutical Co., Ltd. (hereinafter 'Hankook Pharmaceutical'), and has managed offerings collected from believers in the 'Evangelical Baptist Church' across the country.

4.1.2. On January 13, 2000, at an unknown place in Seoul, KIM Heakyung purchased 3,669m<sup>2</sup> of land located at 411 Hyojado-ri, Ocheon-myeon, Boryeong-si, Chungcheongnam-do in her name, and withdrew about KRW 14,235,720 (based on the official land value) from victim Evangelical Baptist Church, to use the money as a payment for the land, thereby embezzling the above amount of money. In addition, from then on to April 3, 2014, KIM Heakyung embezzled a total of KRW 23,573,205,277 (based on the official land value) from the victim on 90 different occasions by using the money to acquire real estates in her name.

#### 4.2. Relevant Evidence

The evidence is sufficient to prosecute KIM Heakyung on charge of violating the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes (embezzlement).

4.2.1. On April 25, 2014, at the Incheon DPO, LEE Cheong made the following statements to prosecutor CHOI Won-seok:

"KIM Myung-jeom receives cash from YOO Byung Eyn's affiliate companies and delivers it to KIM Heakyung who is close with YOO Byung Eyn. JEONG In-sook, an employee of Hankook Pharmaceutical, gives offerings collected from believers in the 'Evangelical Baptist Church' across the country to KIM Heakyung."

4.2.2. On April 29, 2014, at the Incheon DPO, KIM Gyu-seok made the following statements to prosecutor CHOI Won-seok:

"As an employee in charge of finance of Semo Group, I paid KRW 1,500,000,000 so as to have the business right of Korea Pharmaceutical (CEO: KIM Heakyung) transferred, under the direction of GO Chang-hwan, but the business right has not been transferred."

4.2.3. On May 6, 2014, at the Incheon DPO, GO Chang-hwan made the following statements to prosecutor CHOI Won-seok:

"KIM Heakyung and YOO Byung Eyn have a very close relationship. KRW 1,500,000,000 was paid so as to obtain the business right of Hankook Pharmaceutical (CEO: KIM Heakyung), but it has not been transferred."

4.2.4. According to the financial transaction records of KIM Heakyung, from January 7, 2009 to June 21, 2013, a total of KRW 1,928,000,000 had been deposited and KRW 1,376,000,000 in cash had been withdrawn during the same period. The records of real estates owned by KIM Heakyung show that up to recently, she had acquired real estate worth about KRW 23,500,000,000 on 90 different occasions.

4.2.5. The above statements by LEE Cheong, KIM Gyu-seok, and GO Chang-hwan were legitimately made in accordance with the

procedures pursuant to the Criminal Procedure Act of the Republic of Korea, and documented and maintained at the Incheon DPO in charge of the investigation of this case. Relevant evidence such as KIM Heakyung's financial transaction records and the records of real estate was collected legally in accordance with the procedures pursuant to the Criminal Procedure Act of the Republic of Korea, and kept in files together with the above-mentioned statements.

## **5. APPLICABLE LAW OF KOREA**

5.1. The applicable laws of Korea for the crime committed by KIM Heakyung violating the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes (embezzlement) are as follows.

### **5.1.1. Embezzlement**

#### **Article 355(1) of the Criminal Act**

A person who, having the custody of another's property, embezzles or refuses to return it, shall be punished by imprisonment for not more than five years or by a fine not exceeding fifteen million won.

5.1.2. Violation of the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes (Embezzlement)

#### **Article 3(1)1 of the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes**

Any person who commits crimes as prescribed in Article 347 (fraud), 350 (extortion), 351 (limited to the habitual

crime as prescribed in Articles 347 and 350), 355 (embezzlement, breach of trust) or 356 (occupational embezzlement, occupational breach of trust) of the Criminal Act, shall, if the value of the goods or profits on property which he gains or has another person gain is five hundred million won or more, be punished additionally as follows:

1. If the amount of profit is five billion won or more, he shall be punished by imprisonment for lifetime or not less than five years;

5.1.3. A person who commits embezzlement, if the amount of damages is five hundred million won or more, shall be subject to aggravated punishment pursuant to the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes.

#### 5.1.4. Statute of Limitations

Under Article 249(1) of the Korean Criminal Procedure Act, the statute of limitations for crimes subject to lifetime imprisonment is fifteen (15) years for crimes punishable by imprisonment for life. According to Article 253(3) of the Criminal Procedure Act, the statute of limitations shall be suspended during the period for which the offender stays abroad for the purpose of avoiding criminal punishment. Therefore, the statute of limitations for KIM Heakyung has not expired yet.

#### **Article 249(1) of the Criminal Procedure Act**



① The statute of limitations shall expire upon the lapse of the following terms:

1. Twenty-five years for crimes punishable with death penalty;
2. Fifteen years for crimes punishable with imprisonment without prison labor for life or imprisonment for life;
3. Ten years for crimes punishable with imprisonment or imprisonment without prison labor for a maximum term of ten years or more;
4. Seven years for crimes punishable with imprisonment or imprisonment without prison labor for a maximum term of less than ten years; and
5. Five years for crimes punishable with imprisonment or imprisonment without prison labor for a maximum term of less than five years, or suspension of qualifications for a maximum term of not less than ten years, or a fine

---

**Article 253(3) of the Criminal Procedure Act**

The limitation period shall be suspended during the period, for which an offender stays abroad for the purpose of escaping criminal punishment.

- 5.2. The aforementioned laws are currently in effect in Korea and were also effective between January 2008 and March 31, 2014 when KIM Heakyung allegedly violated the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes (Embezzlement).

## **6. ARREST WARRANT SYSTEM IN THE REPUBLIC OF KOREA**

- 6.1. As set forth above, an arrest warrant has been issued for KIM Heakyung for violating the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes (Embezzlement).
- 6.2. In cases where it is difficult to prosecute a suspect on the run as it is in this case, the prosecution shall be suspended as a mid-step, and the prosecutor temporarily closes the investigation and seeks to have a warrant of arrest or detention for the suspect. With the arrest warrant issued, the prosecutor locates the whereabouts of the suspect and puts him on the wanted list so as to make the arrest. Therefore, when the prosecution is suspended due to the suspect's unknown whereabouts as in this case, neither prosecution to the court nor trial procedures proceeds so that there are no documents related to the indictment available in the case records.
- 6.3. Under the Criminal Procedure Act of the Republic of Korea, the prosecutor can request a relevant district judge to issue an arrest warrant to detain a suspect if there is sufficient evidence found during the investigation to believe that the suspect committed the crime; the suspect refuses to yield to a prosecutor's summons to appear; or the suspect is likely to refuse such summons.
- 6.4. The judge will issue an arrest warrant only when it is determined that the request provides reasonable grounds for an arrest (Articles 201 and 201-2 of the *Criminal Procedure Act*). For this reason, the fact that an arrest

warrant has been issued reflects that the judge is also convinced there are reasonable grounds to believe that the suspect committed the crime as described in the arrest warrant.

6.5. On May 8, 2014, Judge PARK Seong-yong of the Incheon District Court issued an arrest warrant for KIM Heakyung upon my request. The arrest warrant, which will be valid until April 2, 2029, is a judicial document that grants the right to arrest KIM Heakyung on or prior to April 2, 2029 for violating the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes. Judge PARK Seong-yong of the Incheon District Court has authority to issue such arrest warrant under the Korean law. The original arrest warrant is kept on the investigation file of this case for the relevant criminal procedures in Korea. I have reviewed the original in person and confirm that Annex 2 is a genuine and exact copy of the arrest warrant.

7. I hereby certify that the aforementioned are all true to my knowledge. I am submitting this statement of confirmation, being well-aware that I may be punished for falsely producing official documents pursuant to Article 227 of the *Criminal Act* of Korea.

May 14, 2014

Respectfully submitted by  
Prosecutor JEONG Soon Shin  
Incheon District Prosecutors' Office

Annex:

1. A genuine and exact copy of KIM Heakyung's photograph
2. A genuine and exact copy of the arrest warrant for KIM Heakyung



# Warrant of Arrest

Incheon District Court

<b>Warrant No.</b>	2014-7382	<b>Criminal Offense</b>	Violation of the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes (Embezzlement)	
<b>Suspect</b>	<b>Name</b>	KIM Heakyung	<b>Occupation</b>	Others
	<b>Resident Registration #</b>	621210-2567913	<b>Nationality</b>	Korean
	<b>Address</b>			
<b>Prosecutor</b>	JEONG Soon Shin		<b>Date of Application</b>	2014.5.8. 20:28
<b>Defense Attorney</b>			<b>Date of Expiry</b>	2029.4.2.
<b>Facts of Crime</b>	See Enclosure		<b>Place of Custody</b>	Incheon District Prosecutors' Office
<b>Place of Detention</b>	Incheon Detention Center			
<input checked="" type="checkbox"/> The suspect failed to attend in accordance with the summons served on him/her without a plausible reason.  <input type="checkbox"/> The suspect may fail to attend in accordance with the summons served on him/her, without a plausible reason.		<p>As there is sufficient reason to believe that the defendant has committed the offense(s) set out in the attachment and there is ground for his/her arrest, the defendant shall be arrested and brought to court. If this warrant is not enforced on or before the date of expiry, it shall no longer be enforceable and the warrant shall be returned.</p>		
<input type="checkbox"/> The suspect has no fixed address (for crimes resulting in a fine not exceeding KRW 500,000, detention, or a minor fine).		<p>2014. 5.8.</p> <p>Judge PARK Seong-yong (<i>sealed</i>)</p>		
<b>Date of Arrest</b>	20 . . . :	<b>Place of Arrest</b>		
<b>Date of Custody</b>	20 . . . :	<b>Place of Custody</b>		
<b>Date of Detention</b>	20 . . . :	<b>Place of Detention</b>		
<b>Reasons for Failed Execution</b>				
<b>Office/Title of Person in Charge</b>			<b>Signature of Person in Charge</b>	

## **Facts of Crime**

### **1. Information on the Suspect**

Suspect KIM Heakyung is close to YOO Byung Eyn who is leading the 'Evangelical Baptist Church.' KIM Heakyung holds 6.29% share of I-One-I Holdings Co., Ltd. (hereinafter 'I-One-I Holdings') which is the holding company of 'Semo Group', and 24.4% share of Dapanda Co., Ltd. (hereinafter 'Dapanda') which is one of major affiliate companies. She has served as the CEO of Hankook Pharmaceutical Co., Ltd. (hereinafter 'Hankook Pharmaceutical'), and has managed offerings collected from believers in the 'Evangelical Baptist Church' across the country.

### **2. Facts of Crime**

On January 13, 2000, at an unknown place in Seoul, KIM Heakyung purchased 3,669m<sup>2</sup> of land located at 411 Hyojado-ri, Ocheon-myeon, Boryeong-si, Chungcheongnam-do in her name, and withdrew about KRW 14,235,720 (based on the official land value) from victim Evangelical Baptist Church, to use the money as a payment for the land, thereby embezzling the above amount of money. In addition, from then on to April 3, 2014, KIM Heakyung embezzled a total of KRW 23,573,205,277 (based on the official land value) from the victim on 90 different occasions by using the money to acquire real estates in her name, as listed in the attached Accounts of Crime (1).

# ACCOUNTS OF CRIME (1)

No	Date	Location	Lot No	Area	Title Holder	Amount of Embezzlement (official land value as of the acquisition date)	Remarks (official land value per pyeong)
1	20000113	Hyojado-ri, Ocheon-myeon, Boryeong-si, Chungcheongnam-do	411	3669	KIM Heakyung	14,235,720	3,880
2	20071214	Yeoksam-dong, Gangnam-gu, Seoul	601-21	301.2	KIM Heakyung	1,159,620,000	3,850,000
3	20071214	Yeoksam-dong, Gangnam-gu, Seoul	601-21	301.2	KIM Heakyung	1,159,620,000	3,850,000
4	20071214	Yeoksam-dong, Gangnam-gu, Seoul	601-21	301.2	KIM Heakyung	1,159,620,000	3,850,000
5	20071214	Yeoksam-dong, Gangnam-gu, Seoul	601-21	301.2	KIM Heakyung	1,159,620,000	3,850,000
6	20071214	Yeoksam-dong, Gangnam-gu, Seoul	601-21	301.2	KIM Heakyung	1,159,620,000	3,850,000
7	20071214	Yeoksam-dong, Gangnam-gu, Seoul	601-21	301.2	KIM Heakyung	1,159,620,000	3,850,000
8	20071214	Yeoksam-dong, Gangnam-gu, Seoul	601-21	301.2	KIM Heakyung	1,159,620,000	3,850,000
9	20071214	Yeoksam-dong, Gangnam-gu, Seoul	601-21	301.2	KIM Heakyung	1,159,620,000	3,850,000
10	20071214	Yeoksam-dong, Gangnam-gu, Seoul	601-21	301.2	KIM Heakyung	1,159,620,000	3,850,000
11	20071214	Yeoksam-dong, Gangnam-gu, Seoul	601-21	301.2	KIM Heakyung	1,159,620,000	3,850,000
12	20071214	Yeoksam-dong, Gangnam-gu, Seoul	601-21	301.2	KIM Heakyung	1,159,620,000	3,850,000
13	20071214	Yeoksam-dong, Gangnam-gu, Seoul	601-21	301.2	KIM Heakyung	1,159,620,000	3,850,000
14	20040728	Anjung-ri, Anjung-eup, Pyeongtaek-si, Gyeonggi-do	101-6	658	KIM Heakyung	78,302,000	119,000
15	20040728	Anjung-ri, Anjung-eup, Pyeongtaek-si, Gyeonggi-do	101-7	1124	KIM Heakyung	240,536,000	214,000
16	20040225	Anjung-ri, Anjung-eup, Pyeongtaek-si, Gyeonggi-do	San 81-1	7364	KIM Heakyung	927,864,000	126,000
17	20040827	Anjung-ri, Anjung-eup, Pyeongtaek-si, Gyeonggi-do	San 83-6	992	KIM Heakyung	101,184,000	102,000
18	20140402	Hyeonhwa-ri, Anjung-eup, Pyeongtaek-si, Gyeonggi-do	San 346-1	3967	KIM Heakyung	817,202,000	206,000
19	20111208	Hyeonhwa-ri, Anjung-eup, Pyeongtaek-si, Gyeonggi-do	San 369	1651	KIM Heakyung	652,145,000	395,000
20	20111208	Hyeonhwa-ri, Anjung-eup, Pyeongtaek-si, Gyeonggi-do	San 369-1	1691	KIM Heakyung	750,804,000	444,000
21	20130904	Hyeonhwa-ri, Anjung-eup, Pyeongtaek-si, Gyeonggi-do	San 377-7	1653	KIM Heakyung	206,625,000	125,000
22	20100917	Hyeonhwa-ri, Anjung-eup, Pyeongtaek-si, Gyeonggi-do	San 377-8	1653	KIM Heakyung	198,360,000	120,000
23	20090817	Manho-ri, Poseung-eup, Pyeongtaek-si, Gyeonggi-do	271-21	1261	KIM Heakyung	535,925,000	425,000
24	20090817	Manho-ri, Poseung-eup, Pyeongtaek-si, Gyeonggi-do	284-4	1321	KIM Heakyung	167,767,000	127,000
25	20020822	Manho-ri, Poseung-eup, Pyeongtaek-si, Gyeonggi-do	284-8	662	KIM Heakyung	99,962,000	151,000
26	20120531	Hwayang-ri, Hyeondeok-myeon,	821-1	1042	KIM Heakyung	182,350,000	175,000



		Pyeongtaek-si, Gyeonggi-do					
27	20120531	Hwayang-ri, Hyeondeok-myeon, Pyeongtaek-si, Gyeonggi-do	821-2	646	KIM Heakyung	57,041,800	88,300
28	20120531	Hwayang-ri, Hyeondeok-myeon, Pyeongtaek-si, Gyeonggi-do	821-3	18	KIM Heakyung	545,400	30,300
29	20040225	Ingwang-ri, Hyeondeok-myeon, Pyeongtaek-si, Gyeonggi-do	183-2	564	KIM Heakyung	42,130,800	74,700
30	20040225	Ingwang-ri, Hyeondeok-myeon, Pyeongtaek-si, Gyeonggi-do	185-7	842	KIM Heakyung	59,276,800	70,400
31	20040225	Ingwang-ri, Hyeondeok-myeon, Pyeongtaek-si, Gyeonggi-do	San 85-13	1983	KIM Heakyung	139,603,200	70,400
32	20120604	Deongmok-ri, Hyeondeo-myeon, Pyeongtaek-si, Gyeonggi-do	853-1	376	KIM Heakyung	20,680,000	55,000
33	20120604	Daeon-ri, Hyeondeo-myeon, Pyeongtaek-si, Gyeonggi-do	974-3	4953	KIM Heakyung	296,684,700	59,900
34	20120604	Daeon-ri, Hyeondeo-myeon, Pyeongtaek-si, Gyeonggi-do	1290-7	992	KIM Heakyung	40,572,800	40,900
35	20120604	Daeon-ri, Hyeondeo-myeon, Pyeongtaek-si, Gyeonggi-do	499-2	7091	KIM Heakyung	520,479,400	73,400
36	20120604	Daeon-ri, Hyeondeo-myeon, Pyeongtaek-si, Gyeonggi-do	502-4	492	KIM Heakyung	32,422,800	65,900
37	20120605	Daeon-ri, Hyeondeo-myeon, Pyeongtaek-si, Gyeonggi-do	502-7	541	KIM Heakyung	46,526,000	86,000
38	20120605	Daeon-ri, Hyeondeo-myeon, Pyeongtaek-si, Gyeonggi-do	502-9	70	KIM Heakyung	5,474,000	78,200
39	20120604	Daeon-ri, Hyeondeo-myeon, Pyeongtaek-si, Gyeonggi-do	502-12	4584	KIM Heakyung	302,085,600	65,900
40	20120604	Daeon-ri, Hyeondeo-myeon, Pyeongtaek-si, Gyeonggi-do	502-13	170	KIM Heakyung	11,985,000	70,500
41	20120604	Daeon-ri, Hyeondeo-myeon, Pyeongtaek-si, Gyeonggi-do	San 6-1	2757	KIM Heakyung	218,078,700	79,100
42	20130904	Jangsu-ri, Hyeondeo-myeon, Pyeongtaek-si, Gyeonggi-do	430-2	5250	KIM Heakyung	436,800,000	83,200
43	20130904	Jangsu-ri, Hyeondeo-myeon, Pyeongtaek-si, Gyeonggi-do	San 101-3	296	KIM Heakyung	24,272,000	82,000
44	20091222	Gomae-dong, Gilheung-gu, Yongin-si, Gyeonggi-do	263-6	1398	KIM Heakyung	915,690,000	655,000
45	20091222	Songgal-ri, Hobeop-myeon, Icheon-si, Gyeonggi-do	San 67	21419	KIM Heakyung	259,169,900	12,100
46	20091222	Songgal-ri, Hobeop-myeon, Icheon-si, Gyeonggi-do	San 67-2	323	KIM Heakyung	3,714,500	11,500
47	20091222	Songgal-ri, Hobeop-myeon, Icheon-si, Gyeonggi-do	San 68-1	6849	KIM Heakyung	78,763,500	11,500
48	20091222	Songgal-ri, Hobeop-myeon, Icheon-si, Gyeonggi-do	San 68-2	8231	KIM Heakyung	88,894,800	10,800
49	20091222	Songgal-ri, Hobeop-myeon, Icheon-si, Gyeonggi-do	San 68-4	262	KIM Heakyung	3,013,000	11,500
50	20091222	Songgal-ri, Hobeop-myeon, Icheon-si, Gyeonggi-do	San 69-1	20629	KIM Heakyung	218,667,400	10,600
51	20030821	Majeon-ri, Samjuk-myeon, Anseong-si, Gyeonggi-do	24-13	193	KIM Heakyung	16,984,000	88,000
52	20030821	Majeon-ri, Samjuk-myeon, Anseong-si, Gyeonggi-do	24-15	1242	KIM Heakyung	109,296,000	88,000
53	20030821	Majeon-ri, Samjuk-myeon, Anseong-si, Gyeonggi-do	24-21	897	KIM Heakyung	78,936,000	88,000

54	20030220	Jeonsu-ri, Gangha-myeon, Yangpyeong-gun, Gyeonggi-do	31-9	918	KIM Heakyung	27,264,600	29,700
55	20030220	Jeonsu-ri, Gangha-myeon, Yangpyeong-gun, Gyeonggi-do	31-15	343	KIM Heakyung	10,187,100	29,700
56	20030220	Jeonsu-ri, Gangha-myeon, Yangpyeong-gun, Gyeonggi-do	31-23	330	KIM Heakyung	2,722,500	8,250
57	20030220	Jeonsu-ri, Gangha-myeon, Yangpyeong-gun, Gyeonggi-do	31-41	28	KIM Heakyung	69,160	2,470
58	20030220	Jeonsu-ri, Gangha-myeon, Yangpyeong-gun, Gyeonggi-do	31-43	582	KIM Heakyung	23,047,200	39,600
59	20030220	Jeonsu-ri, Gangha-myeon, Yangpyeong-gun, Gyeonggi-do	31-47	109	KIM Heakyung	3,237,300	29,700
60	20001013	Jeonsu-ri, Gangha-myeon, Yangpyeong-gun, Gyeonggi-do	31-52	5950	KIM Heakyung	174,930,000	29,400
61	20030220	Jeonsu-ri, Gangha-myeon, Yangpyeong-gun, Gyeonggi-do	31-53	33	KIM Heakyung	81,510	2,470
62	20001013	Jeonsu-ri, Gangha-myeon, Yangpyeong-gun, Gyeonggi-do	31-54	1050	KIM Heakyung	7,087,500	6,750
63	20030220	Jeonsu-ri, Gangha-myeon, Yangpyeong-gun, Gyeonggi-do	31-55	136	KIM Heakyung	4,039,200	29,700
64	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	1519	1332	KIM Heakyung	3,463,200	2,600
65	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	1520	4060	KIM Heakyung	1,429,120	352
66	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	1521	1101	KIM Heakyung	9,523,650	8,650
67	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	1522	2579	KIM Heakyung	6,163,810	2,390
68	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	1523	585	KIM Heakyung	1,521,000	2,600
69	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	1524	450	KIM Heakyung	1,170,000	2,600
70	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	1525	1821	KIM Heakyung	16,589,310	9,110
71	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	1525-1	966	KIM Heakyung	2,608,200	2,700
72	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	1526	6172	KIM Heakyung	2,110,824	342
73	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	1526-1	1021	KIM Heakyung	9,587,190	9,390
74	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	1526-2	40818	KIM Heakyung	14,653,662	359
75	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	1527	2166	KIM Heakyung	5,631,600	2,600
76	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	1530	10500	KIM Heakyung	27,300,000	2,600
77	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	1535	1980	KIM Heakyung	5,148,000	2,600
78	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	1538	28460	KIM Heakyung	73,996,000	2,600
79	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	1544	1008	KIM Heakyung	2,620,800	2,600
80	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	San 650	3471	KIM Heakyung	458,172	132
81	20080725	Daegi-ri, Wangsan-myeon, Gangneung-si, Gangwon-do	San 651-1	19789	KIM Heakyung	2,592,359	131
82	20121204	Yugyo-ri, Samhyang-eup, Muan-gun, Jeollanam-do	653-6	1257	KIM Heakyung	21,117,600	16,800
83	20121204	Yugyo-ri, Samhyang-eup, Muan-gun, Jeollanam-do	653-7	826	KIM Heakyung	11,564,000	14,000

84	20121204	Yugyo-ri, Samhyang-eup, Muan-gun, Jeollanam-do	654	1119	KIM Heakyung	15,666,000	14,000
85	20121204	Yugyo-ri, Samhyang-eup, Muan-gun, Jeollanam-do	656-1	312	KIM Heakyung	4,524,000	14,500
86	20140403	Yugyo-ri, Samhyang-eup, Muan-gun, Jeollanam-do	800	643	KIM Heakyung	20,640,000	32,000
87	20140403	Yugyo-ri, Samhyang-eup, Muan-gun, Jeollanam-do	801	1610	KIM Heakyung	51,520,000	32,000
88	20140403	Yugyo-ri, Samhyang-eup, Muan-gun, Jeollanam-do	802	1683	KIM Heakyung	35,006,400	20,800
89	20140403	Yugyo-ri, Samhyang-eup, Muan-gun, Jeollanam-do	803	1590	KIM Heakyung	31,800,000	20,000
90	20101027	Dopyeong-ri, Hyeondong-myeon, Cheongsong-gun, Gyeongbuk	San 79-1	180595	KIM Heakyung	25,644,490	142
Total					KRW 23,573,205,277		

## **STATEMENT OF CONFIRMATION**

I, JEONG Soon Shin, Prosecutor of the Incheon District Prosecutors' Office ("Incheon DPO") in Korea hereby certify the following in support of the request for the extradition of KIM Pil Bae from the United States of America to the Republic of Korea pursuant to the Extradition Treaty between the Republic of Korea and the United States of America, which became effective on December 20, 1999.

### **1. QUALIFICATIONS**

1.1. I am a public prosecutor of the Incheon DPO under the Korean Ministry of Justice. After passing the National Bar Examination in 1995, I completed the two-year required program at the Judicial Research and Training Institute, an affiliate of the Supreme Court of Korea. In 1998, I obtained the qualifications to work as a judge, prosecutor, or lawyer in Korea. Since 2001, I have been working as a prosecutor under the appointment of the President of Korea. Based on my training, experience, and position, I clearly understand the criminal code and criminal procedures of Korea. As the prosecutor in charge of investigating this case, I am well aware of the matters of this case.

1.2. Under the Korean law, a prosecutor, who presides over investigation, may choose to either investigate independently or supervise the police as they investigate the case. Once the investigation is completed, the prosecutor exclusively decides on the indictment. Thereafter, the prosecutor is in charge of maintaining the indictment and executing the final judgment of the court. According to the principle of the exclusive power of a prosecutor, the court may proceed with the trial procedures only for the cases indicted by a prosecutor. Furthermore, according to the Korean practice on investigation and indictment, a prosecutor does not indict a suspect without his custody. In this case, however, the suspect has not been indicted as his whereabouts has not been located.

---

## **2. INFORMATION ON KIM PIL BAE**

2.1. KIM Pil Bae is a male citizen of the Republic of Korea who was born in the Republic of Korea on February 9, 1938. His address in Korea is #1301-102, 37-0 Dokseodang-ro 40-gil, Seongdong-gu, Seoul. He holds a Korean passport numbered M31932534 and his English name is PIL BAE KIM.

2.2. Annex 1 is a genuine and exact copy of KIM Pil Bae's photograph submitted to the administrative agency for the issuance of his Resident Registration Card.

2.3. On April 19, 2014, KIM Pil Bae departed for the US but has not returned to the Republic of Korea. It has been confirmed that he currently resides in the US.

### **3. PROGRESS OF THE CASE**

#### **3.1. Background of Investigation**

3.1.1. In the wake of the sinking of the 'Sewol Ferry' off the southwestern island of Jindo, Korea, on April 16, 2014, the Joint Investigation Team of Prosecutors and Police in Mokpo started investigating the captain and the officer of the ferry for their negligence during the operation of the ferry on the date of accident, and also Chonghaejin Marine Company ("Chonghaejin Marine"), the operator of the Sewol ferry, for violating its occupational duty of ship management.

3.1.2. In the above-mentioned investigation process, both the media and those who once worked for Semo Co., Ltd. ("Semo Group"), the holding company of Chonghaejin Marine, determined that the Sewol Ferry accident had been caused not only by the negligence committed by individuals such as the captain but also by structural problems resulting

in a 'safety accident typical of underdeveloped countries,' including ① lack of transparency in Chonghaejin Marine and its affiliate companies and ② safety ignorance stemming from the desire of Chonghaejin Marine and its affiliate companies for reckless expansion, and they called for government-wide actions to prevent any future accidents of the same kind.

3.1.3. Under these circumstances, suspicions arose regarding the success of the head of Semo Group, YOO Byung Eyn, who had been arrested and sentenced to four years of imprisonment for habitual fraud against the followers of the church around 1995, but was able to restore his Group, owning around 50 affiliate companies with the total asset value of approximately KRW 560,000,000,000 not long after he finished serving his sentence. After analyzing open-source information including audit reports and tax settlement documents of Semo Group's affiliate companies, reported to the Financial Supervisory Service, it was discovered that YOO Byung Eyn and his family managed the company without any transparency and in an undisclosed manner through a small number of close aides who had no expertise. Meanwhile, they had allegedly embezzled affiliate companies' assets frequently, and in order to commit such crimes, they had allegedly omitted legal decision-making

processes, frequently provided unfair support to the affiliate companies and conducted self-dealings. After discovering the above, a full-scale investigation was launched.

### 3.2. Proceedings of Investigation

3.2.1. The Special Investigation Team conducted investigation on about 70 people including accountants KIM Chun-gyun and PARK Gwon-jong who audited the affiliate companies; GO Chang-hwan, the CEO of Semo Group; KIM Han-sik, the CEO of Chonghaejin Marine; SONG Guk-bin, the CEO of Dapanda Co., Ltd.; BYEON Gi-chun, the CEO of Chonhaiji Co., Ltd.; LEE Jae-yeong, the CEO of Ahae Co., Ltd.; KIM Gyeong-suk, the CEO of Noreunja Shopping Co., Ltd.; OH Gyeong-seok, the CEO of Hemato Centric Life Research Institute; PARK Seung-il, the auditor for I-One-I Holdings Co., Ltd.; and KIM Dong-hwan, the auditor for Dapanda Co., Ltd. The Special Investigation Team also checked the replies of the affiliate companies to the Korea Financial Intelligence Unit and their transaction records for advisory fees, trademark royalties and payments for photographs made out to YOO Byung Eyn and his family.

3.2.2. As a result, it has been confirmed that YOO Byung Eyn, YOO Dae Kyoon, YOO Hyuk Kee, YOO Chong Somena, KIM Pil Bae, KIM Dong-hwan, PARK Seung-il, GO Chang-hwan, LEE Jae-yeong,



and BYEON Gi-chun conspired to have the affiliate companies arbitrarily make payments out of their total sales to YOO Byung Eyn, YOO Chong Somena, YOO Dae Kyoona and YOO Hyuk Kee under various names such as business consulting fees, trademark royalties and payments for the purchase of photographs, and that it caused adverse effects on the yield structure of the affiliate companies.

3.2.3. From April 30, 2014 to May 8, 2014, the Special Investigation Team directly handed over the summons to KIM Yeon-su, the daughter of KIM Pil Bae who currently resides in the US, requesting KIM Pil Bae to respond to the summons three times, but he has failed to appear.

3.2.4. On May 8, 2014, the Special Investigation Team requested the Incheon District Court to issue an arrest warrant for KIM Pil Bae, and Judge PARK Seong-yong of the above-mentioned court issued the arrest warrant on the same day.

---

Annex 2 is a genuine and exact copy of the arrest warrant issued by Judge PARK Seong-yong.

3.2.5. Currently, the Korean Office of US Homeland Security Investigations is providing cooperation in the investigation of this case.

#### **4. EXTRADITABLE CRIME AND RELEVANT EVIDENCE**

##### **4.1. Extraditable Crime**

KIM Pil Bae violated Article 3(1)1 of the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes, and Article 355(1) of the Criminal Act (embezzlement). The details of his crime are as follows.

4.1.1. From September 21, 2000 to March 18, 2014, KIM Pil Bae served as the CEO of victim Dapanda Co., Ltd. (hereinafter 'Dapanda') which specializes in 'commodity (cosmetics, food and pharmaceutical products, etc.) brokerage'. He was also the CEO of I-One-I Holdings Co., Ltd. (hereinafter 'I-One-I Holdings'), which is the holding company of 'Dapanda', and was in overall charge of financial affairs of the victim company along with Co-CEO SONG Guk-bin of 'Dapanda' (currently under investigation while held in custody). In order to raise slush funds for its largest shareholder YOO Byung Eyn and his family, KIM Pil Bae conspired with SONG Guk-bin to embezzle a total of KRW 7,199,783,200 from victim 'Dapanda'. The details of crime are specified below in the following paragraphs from 4.1.2. to 4.1.5.

4.1.2. Around December 1, 2007, at the office of 'Dapanda' located at 798-3 Yeoksam-dong, Gangnam-gu, Seoul, KIM Pil Bae signed a 'Business Consulting Service Contract' obligating the victim company to make a monthly payment of KRW 7,000,000 to 'I-One-I Holdings',

even though he was aware that the victim company did not require regular business consulting service for risk management, etc. and 'I-One-I Holdings' was not capable of offering practical consulting service to the victim company. Around that time, KIM Pil Bae not only wire-transferred KRW 7,000,000 from the victim company to the Woori Bank account held by I-One-I Holdings as a business consulting fee but also from that time on until March 2014, wire-transferred KRW 7,000,000 to 'I-One-I Holdings' every month, thereby embezzling a total of KRW 499,545,440 out of the victim's money that he held for business purposes.

4.1.3. Around January 3, 2011, at the office of 'Dapanda', KIM Pil Bae signed an 'Appointment of Advisor Contract' with YOO Byung Eyn to provide him with a monthly payment of KRW 15,000,000, even though he was aware that YOO Byung Eyn did not play any special role concerning the management of the victim company. Around that time, KIM Pil Bae not only wire-transferred KRW 15,000,000 from the victim company to the Woori Bank account held by YOO Byung Eyn as a business advisory fee but also from that time on until March 2014, wire-transferred KRW 15,000,000 to YOO Byung Eyn every month, thereby embezzling a total of

KRW 570,000,000 out of the victim's money that he held for business purposes.

4.1.4. Around September 2000, at the office of 'Dapanda', KIM Pil Bae signed an 'Trademark Exclusive License Contract' with YOO Dae Kyoon (0.75% of the monthly revenue), even though there is no brand value in the name 'Dapanda' that YOO Dae Kyoon registered, the trademark registration fee is about KRW 300,000 only and the name is quite replaceable with other names. Around that time, KIM Pil Bae not only wire-transferred KRW 201,125,000 from the victim company to the Woori Bank account held by YOO Dae Kyoon but also from that time on until April 2014, wire-transferred trademark royalties to YOO Dae Kyoon, thereby embezzling a total of KRW 1,879,571,760 out of the victim's money that he held for business purposes.

4.1.5. Around April 2009, at the office of 'Dapanda', KIM Pil Bae signed a 'Design Development Service Contract' that calls for a monthly payment of KRW 80,000,000 to be made to Moreal Design Inc. (CEO: YOO Chong Somena; hereinafter 'Moreal Design') even though he was aware that 'Dapanda' had tens of branch offices and local distributors that sell its products from door to door so that there was no need for sales preparations or

assistance except for large-scale annual or bi-annual sales promotions hosted by the head office. Then, KIM Pil Bae not only wire-transferred KRW 80,000,000 from the victim company to the Nonghyup Bank account held by YOO Chong Somena as a service fee but also from January 2004 on until December 2013, wire-transferred payments for design consulting service to YOO Chong Somena, thereby embezzling a total of KRW 4,170,666,000 out of the victim's money that he held for business purposes.

#### 4.2. Relevant Evidence

The evidence is sufficient to indict KIM Pil Bae on charge of violating the Act on the Aggravated Punishment, etc. of Specific Economic Crimes (embezzlement) under the Criminal Act of the Republic of Korea.

##### 4.2.1. On April 26, 2014, at the Incheon DPO, KIM Chun-gyun made the following statements to prosecutor KIM Jeong-guk:

"PARK Seung-il and KIM Dong-hwan established the management structure of affiliate companies for the YOO Byung Eyn family based on the advice received from outside. YOO Hyuk Kee favors PARK Seung-il and even said not to interfere with him in private." "Under the order of YOO Byung Eyn, each affiliate company raises funds using many excuses and the slush funds are transferred to the YOO Byung Eyn family via I-One-I Holdings Co., Ltd. They also

restructure the corporate governance so as to better obtain such funds. PARK Seung-il frequently goes abroad with YOO Hyuk Kee because he is in charge of the management of funds in other countries. Every year, affiliate companies pay certain percentages of their revenues to SLPLUS (CEO: YOO Dae Kyoong) for consulting and the use of trademark; Moreal Design (CEO: YOO Chong Somena) for design service; Parrotbill (represented by YOO Byung Eyn) for consulting and the use of trademark; and Key Solution (CEO: YOO Hyuk Kee, the second son of YOO Byung Eyn) for consulting and the use of trademark. Dapanda also had to pay 2~3% of its revenues (approximately KRW 50,000,000,000), negatively affecting its yield structure." "I-One-I Holdings takes on the role of the audit team and collected the funds from affiliate companies. PARK Seung-il contacted the CEO of each affiliate company and collected money whenever money is needed for YOO Byung Eyn's photograph exhibition, etc."

4.2.2. On April 30, 2014, at the Incheon DPO, BYEON Gi-chun made the following statements to prosecutor LEE Jin-ho:

"YOO Hyuk Kee and KIM Pil Bae gave orders to affiliate companies, and KIM Pil Bae, KIM Han-sik, PARK Seung-il and KIM Dong-hwan conducted audits on affiliate companies and reported the results to YOO Byung Eyn."

- 4.2.3. On April 29, 2014, at the Incheon DPO, YIM Jong-wuk made the following statements to prosecutor HONG Seong-jun:
- "I worked as an accounting clerk at Dapanda and made payments to YOO Byung Eyn, YOO Dae Kyoon and YOO Chong Somena in the names of advisory fees, trademark royalties and service fees, as directed by KIM Pil Bae."
- 4.2.4. On May 3, 2014, at the Incheon DPO, LEE Seong-hwan made the following statements to prosecutor JANG In-ho:
- "It is true that Dapanda paid advisory fees and trademark royalties to Moreal Design and I-One-I Holdings, but I just followed KIM Pil Bae's directions without having knowledge of any details."
- 4.2.5. On May 4, 2014, at the Incheon DPO, LEE Yeong-tae made the following statements to prosecutor HONG Seong-jun:
- "Under the directions of KIM Pil Bae, I subcontracted Moreal Design and paid KRW 80,000,000 every month when Dapanda sold products, but Moreal Design did nothing about design."
- 4.2.6. In the financial transaction records of I-One-I Holdings, Dapanda, Moreal Design, YOO Byung Eyn and YOO Dae Kyoon, it was found that Dapanda had paid advisory fees, trademark royalties and service fees to YOO Byung Eyn and the affiliate companies owned by his family.
- 4.2.7. The aforementioned statements by BYEON Gi-chun, YIM Jong-

wuk, LEE Seong-hwan and LEE Yeong-tae were legitimately made in accordance with the procedures pursuant to the Criminal Procedure Act of the Republic of Korea, and documented and maintained at the Incheon DPO in charge of the investigation of this case. The evidence including financial transaction records of I-One-I Holdings, Dapanda, Moreal Design, YOO Byung Eyn and YOO Dae Kyoon were legitimately gathered in accordance with the procedures pursuant to the Criminal Procedure Act of the Republic of Korea and kept in files together with the above-mentioned statements.

## **5. APPLICABLE LAW OF KOREA**

5.1. The applicable laws of Korea for the crime committed by KIM Pil Bae violating the Act on the Aggravated Punishment, etc. of Specific Economic Crimes (embezzlement) are as follows.

### **5.1.1. Embezzlement**

#### **Article 355(1) of the Criminal Act**

A person who, having the custody of another's property, embezzles or refuses to return it, shall be punished by imprisonment for not more than five years or by a fine not exceeding fifteen million won.

5.1.2. Violation of the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes (embezzlement)

**Article 3(1)1 of the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes**



A person who commits crimes as prescribed in Articles 347 (fraud), 350 (extortion), 351 (limited to the habitual crime as prescribed in Articles 347 and 350), 355 (embezzlement, breach of trust) or 356 (occupational embezzlement, occupational breach of trust) of the Criminal Act, shall, if the value of the goods or profits on property which he gains or has another person gain is five hundred million won or more, be punished additionally as follows:

1. If the amount of profit is five billion won or more, he shall be punished by imprisonment for lifetime or not less than five years;

A person who commits embezzlement, if the amount of damages is five hundred million won or more, shall be subject to aggravated punishment pursuant to the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes.

#### 5.1.3. Statute of Limitations

Under Article 249(1) of the Korean Criminal Procedure Act, the statute of limitations for crimes subject to lifetime imprisonment is fifteen (15) years. According to Article 253(3) of the Criminal Procedure Act, the statute of limitations shall be suspended during the period for which the offender stays abroad for the purpose of avoiding criminal punishment. Therefore, the statute of limitations for KIM Pil Bae has not expired yet.

#### **Article 249(1) of the Criminal Procedure Act**

① The statute of limitations shall expire upon the lapse of the following terms:

1. Twenty-five (25) years for crimes punishable by death penalty;

2. Fifteen (15) years for crimes punishable by imprisonment for life without prison labor or imprisonment for life;
3. Ten (10) years for crimes punishable by imprisonment or imprisonment without prison labor for a period of ten (10) years or more;
4. Seven (7) years for crimes punishable by imprisonment or imprisonment without prison labor for a period not exceeding ten (10) years; and
5. Five (5) years for crimes punishable by imprisonment or imprisonment without prison labor for a period not exceeding five (5) years, suspension of qualifications for a period of ten (10) years or more, or a fine

**Article 253(3) of the Criminal Procedure Act**

The statute of limitations shall be suspended during the period, for which the offender stays abroad for the purpose of avoiding criminal punishment.

- 5.2. The aforementioned laws are currently in effect in the Republic of Korea and were also effective between January 4, 2008 and March 31, 2014 when KIM Pil Bae allegedly violated the Act on the Aggravated Punishment, etc. of Specific Economic Crimes (embezzlement).

**6. ARREST WARRANT SYSTEM IN THE REPUBLIC OF KOREA**

- 6.1. As set forth above, an arrest warrant has been issued for KIM Pil Bae for the violation of the Act on the Aggravated Punishment, etc. of Specific Economic Crimes (embezzlement).

- 6.2. In cases where it is difficult to prosecute a suspect on the run as it is in this case, the prosecution shall be suspended as a mid-step, and the prosecutor temporarily closes the investigation and seeks to have a warrant of arrest or detention for the suspect. With the arrest warrant issued, the prosecutor locates the whereabouts of the suspect and puts him on the wanted list so as to make the arrest. Therefore, when the prosecution is suspended due to the suspect's unknown whereabouts as in this case, neither prosecution to the court nor trial procedures proceeds so that there are no documents related to the indictment available in the case records.
- 6.3. Under the Criminal Procedure Act of the Republic of Korea, the prosecutor can request a relevant district judge to issue an arrest warrant to detain a suspect if there is sufficient evidence found during the investigation to believe that the suspect committed the crime; the suspect refuses to yield to a prosecutor's summons to appear; or the suspect is likely to refuse such summons.
- 6.4. The judge will issue an arrest warrant only when it is determined that the request provides reasonable grounds for an arrest (Articles 201 and 201-2 of the Criminal Procedure Act). For this reason, the fact that an arrest warrant has been issued reflects that the judge is also

convinced there are reasonable grounds to believe that the suspect committed the crime as described in the arrest warrant.

6.5. On May 8, 2014, Judge PARK Seong-yong at the Incheon District Court issued an arrest warrant for KIM Pil Bae upon prosecutor JEONG Soon Shin's request. The arrest warrant, which will be valid until March 10, 2029, is a judicial document that grants the right to arrest KIM Pil Bae on or prior to March 10, 2029 for the violation of the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes (embezzlement). Judge PARK Seong-yong has authority to issue such arrest warrant under the Korean law. The original arrest warrant is kept on the investigation file of this case for the relevant criminal procedures in Korea. I have reviewed the original in person and confirm that Annex 2 is a genuine and exact copy of the arrest warrant.

7. I hereby certify that the aforementioned are all true to my knowledge. I am submitting this statement of confirmation, being well-aware that I may be punished for falsely producing official documents pursuant to Article 227 of the Criminal Act of Korea.

May 14, 2014

Respectfully submitted by  
Prosecutor JEONG Soon Shin  
Incheon District Prosecutors' Office

Annex:

1. A genuine and exact copy of KIM Pil Bae's photograph
2. A genuine and exact copy of the arrest warrant for KIM  
Pil Bae



# Warrant of Arrest

Incheon District Court

<b>Warrant No.</b>	<b>2014-7385</b>	<b>Criminal Offense</b>	Violation of the Act on the Aggravated Punishment, Etc. of Specific Economic Crimes (Embezzlement)	
<b>Suspect</b>	<b>Name</b>	KIM Pil Bae	<b>Occupation</b>	Others
	<b>Resident Registration #</b>	380209-1063620	<b>Country of Citizenship</b>	Korean
	<b>Address</b>			
<b>Prosecutor</b>	JEONG Soon Shin	<b>Date of Application</b>	2014. 5. 8. 20:28	
<b>Defense Attorney</b>		<b>Date of Expiry</b>	2029. 3. 10.	
<b>Facts of Crime</b>	See Enclosure	<b>Place of Custody</b>	Incheon District Prosecutors' Office	
<b>Place of Detention</b>	Incheon Detention Center			
<input checked="" type="checkbox"/> The suspect failed to attend in accordance with the summons served on him/her without a plausible reason.  <input type="checkbox"/> The suspect may fail to attend in accordance with the summons served on him/her, without a plausible reason.  <input type="checkbox"/> The suspect has no fixed address (for crimes resulting in a fine not exceeding KRW 500,000, detention, or a minor fine).		<p>As there are sufficient reasons to believe that the suspect has committed the offense(s) set out in the attachment and there are grounds for his/her arrest, the suspect shall be arrested and brought to court. If this warrant is not enforced on or before the date of expiry, it shall no longer be enforceable. If the warrant expires or there exists no more need to arrest the suspect, the warrant shall be returned.</p> <p>2014. 5. 8.</p> <p>Judge PARK Seong-yong (<i>sealed</i>)</p>		
<b>Date of Arrest</b>	20 . . . :	<b>Place of Arrest</b>		
<b>Date of Custody</b>	20 . . . :	<b>Place of Custody</b>		
<b>Date of Detention</b>	20 . . . :	<b>Place of Detention</b>		
<b>Reasons for Failed Execution</b>				
<b>Office/Title of Person in Charge</b>		<b>Signature of Person in Charge</b>		

## **Facts of Crime**

### **1. Information on the Suspect**

From September 21, 2000 to March 18, 2014, suspect KIM Pil Bae served as the CEO of victim Dapanda Co., Ltd. (hereinafter 'Dapanda') which specializes in 'commodity (cosmetics, food and pharmaceutical products, etc.) brokerage', he is also the CEO of I-One-I Holdings Co., Ltd. (hereinafter 'I-One-I Holdings'), which is the holding company of 'Dapanda', and is in overall charge of financial affairs of the victim company along with Co-CEO SONG Guk-bin of 'Dapanda' (currently under investigation while held in custody). In order to raise slush funds for its largest shareholder YOO Byung Eyn and his family, KIM Pil Bae conspired with SONG Guk-bin to embezzle a total of KRW 7,199,783,200 from victim 'Dapanda' as follows:

### **2. Facts of Crime**

#### **(A) Payment for Business Consulting Fees to I-One-I Holdings Co., Ltd.**

Around December 1, 2007, at the office of 'Dapanda' located at 798-3 Yeoksam-dong, Gangnam-gu, Seoul, suspect KIM Pil Bae signed a 'Business Consulting Service Contract' obligating the victim company to make a monthly payment of KRW 7,000,000 to 'I-One-I Holdings', even though he was aware that the victim company did not require regular business consulting service and 'I-One-I Holdings' was not capable of offering practical consulting service to the victim company. Around that time, KIM Pil Bae not only wire-transferred KRW 7,000,000 from the victim company to the Woori Bank account held by I-One-I Holdings as a business consulting fee but also from that time on until March 2014, wire-transferred KRW 7,000,000 to 'I-One-I Holdings' every month as set forth in the attached Accounts of Crime (1), thereby embezzling a total of KRW 499,545,440 out of the victim's money that he held for business purposes..



**(B) Payment for Business Advisory Fees to YOO Byung Eyn**

Around January 3, 2011, at the office of 'Dapanda', suspect KIM Pil Bae signed an 'Appointment of Advisor Contract' with YOO Byung Eyn to provide him with a monthly payment of KRW 15,000,000, even though he was aware that YOO Byung Eyn did not play any special role concerning the management of the victim company. Around that time, KIM Pil Bae not only wire-transferred KRW 15,000,000 from the victim company to the Woori Bank account held by YOO Byung Eyn as a business advisory fee but also from that time on until March 2014, wire-transferred KRW 15,000,000 to YOO Byung Eyn every month as set forth in the attached Accounts of Crime (2), thereby embezzling a total of KRW 570,000,000 out of the victim's money that he held for business purposes.

**(C) Payment for Trademark Royalties to YOO Dae Kyoon**

Around September 2000, at the office of 'Dapanda', suspect KIM Pil Bae signed an 'Trademark Exclusive License Contract' with YOO Dae Kyoon (0.75% of the monthly revenue), even though there is no brand value in the name 'Dapanda' that YOO Dae Kyoon registered, the trademark registration fee is about KRW 300,000 only and the name is quite replaceable with other names. Around that time, KIM Pil Bae not only wire-transferred KRW 201,125,000 from the victim company to the Woori Bank account held by YOO Dae Kyoon but also from that time on until April 2014, wire-transferred trademark royalties to YOO Dae Kyoon as set forth in the attached Accounts of Crime (3), thereby embezzling a total of KRW 1,879,571,760 out of the victim's money that he held for business purposes.

**(D) Payment for Design Consulting Fees to YOO Chong Somena**

Around April 2009, at the office of 'Dapanda', suspect KIM Pil Bae signed a 'Design Development Service Contract' that calls for a monthly payment of KRW 80,000,000 to be made to Moreal Design Inc. (CEO: YOO Chong Somena; hereinafter 'Moreal

Design') even though he was aware that 'Dapanda' had tens of branch offices and local distributors that sell its products from door to door so that there was no need for sales preparations or assistance except for large-scale annual or bi-annual sales promotions hosted by the head office; and then, KIM Pil Bae not only wire-transferred KRW 80,000,000 from the victim company to the Nonghyup Bank account held by YOO Chong Somena as a service fee but also from January 2004 on until December 2013, wire-transferred payments for consulting service to YOO Chong Somena as set forth in the attached Accounts of Crime (4), thereby embezzling a total of KRW 4,170,666,000 out of the victim's money that he held for business purposes.

**(E) Payment for Transfer of Trademarks Registered by YOO Byung Eyn**

Around April 9, 2010, at the aforementioned office of Dapanda, suspect KIM Pil Bae drew up 'Trademark Transfer Contracts' for 12 trademarks registered by YOO Byung Eyn such as 'Wiromansseo Ollaganeun Geul' and 'Nae Nuwun Deulpaneseo', even though there is no financial value in the trademarks. Then, KIM Pil Bae paid KRW 80,000,000, thereby embezzling KRW 80,000,000 out of the victim's money that he held for business purposes.

### ACCOUNTS OF CRIME (1)

NO.	DATE	PAYER	CEO	RECIPIENT	DAMAGES (Excluding VAT)	DETAILS	REMARKS
1	2007-12-24	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
2	2008-01-16	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
3	2008-02-15	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
4	2008-03-05	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
5	2008-04-02	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
6	2008-05-08	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
7	2008-06-03	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
8	2008-07-01	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
9	2008-08-11	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
10	2008-09-08	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
11	2008-10-07	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
12	2008-11-03	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
13	2008-12-10	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
14	2009-01-07	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
15	2009-02-16	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
16	2009-03-06	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
17	2009-04-02	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
18	2009-05-06	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
19	2009-06-02	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
20	2009-07-01	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
21	2009-08-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
22	2009-09-04	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
23	2009-10-07	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
24	2009-11-05	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
25	2009-12-01	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	

26	2010-01-05	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
27	2010-02-02	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
28	2010-03-03	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
29	2010-04-02	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
30	2010-05-03	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
31	2010-06-08	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
32	2010-07-05	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
33	2010-08-10	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
34	2010-09-02	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
35	2010-10-05	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
36	2010-11-04	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
37	2010-12-07	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
38	2011-01-07	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
39	2011-02-10	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
40	2011-03-09	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	6,363,636	Business Consulting Service	
41	2011-04-11	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
42	2011-05-09	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
43	2011-06-09	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
44	2011-07-08	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
45	2011-08-10	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
46	2011-09-08	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
47	2011-10-10	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
48	2011-11-21	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
49	2011-12-07	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
50	2012-01-06	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
51	2012-02-07	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
52	2012-03-08	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	

53	2012-04-05	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
54	2012-05-08	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
55	2012-06-11	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
56	2012-07-12	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
57	2012-08-10	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
58	2012-09-06	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
59	2012-10-11	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
60	2012-11-09	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
61	2012-12-11	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
62	2013-01-10	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
63	2013-02-07	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
64	2013-03-11	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
65	2013-04-04	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
66	2013-05-06	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
67	2013-06-05	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
68	2013-07-18	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
69	2013-08-08	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
70	2013-09-06	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
71	2013-10-07	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
72	2013-11-08	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
73	2013-12-10	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
74	2014-02-06	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
75	2014-03-07	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	I-One-I Holdings Co., Ltd.	7,000,000	Business Consulting Service	
Total				KRW 499,545,440			

## ACCOUNTS OF CRIME (2)

NO.	DATE	PAYER	CEO	RECIPIENT	DAMAGES (Excluding VAT)	DETAILS	REMARKS
1	2011-10-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	60,000,000	Advisory Fee	
2	2011-11-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	60,000,000	Advisory Fee	
3	2011-12-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	60,000,000	Advisory Fee	
4	2012-01-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
5	2012-02-29	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
6	2012-03-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
7	2012-04-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
8	2012-05-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
9	2012-06-29	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
10	2012-07-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
11	2012-08-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
12	2012-09-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
13	2012-10-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
14	2012-11-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
15	2012-12-28	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
16	2013-01-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
17	2013-02-28	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
18	2013-03-29	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
19	2013-04-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
20	2013-05-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
21	2013-06-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
22	2013-07-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
23	2013-08-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
24	2013-09-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
25	2013-10-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
26	2013-11-29	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	EX-YOO-00164
27	2013-12-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	

	2014-02-10	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
29	2014-02-28	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	PARROTBILL	15,000,000	Advisory Fee	
Total				KRW 570,000,000			

### ACCOUNTS OF CRIME (3)

NO.	DATE	PAYER	CEO	RECIPIENT	DAMAGES (Excluding VAT)	DETAILS	REMARKS
1	Around 2002	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	201,125,000	Trademark Royalty	
2	Around 2003	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	172,719,000	Trademark Royalty	
3	Around 2004	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	164,324,000	Trademark Royalty	
4	2005-01-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	6,306,570	Trademark Royalty	
5	2005-02-28	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	6,064,260	Trademark Royalty	
6	2005-03-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	8,058,590	Trademark Royalty	
7	2005-04-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	11,684,490	Trademark Royalty	
8	2005-05-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	51,279,140	Trademark Royalty	
9	2005-06-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	15,193,660	Trademark Royalty	
10	2005-07-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	7,364,000	Trademark Royalty	
11	2005-08-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	6,032,640	Trademark Royalty	
12	2005-09-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	9,258,220	Trademark Royalty	
13	2005-10-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	12,440,500	Trademark Royalty	
14	2005-11-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	27,230,780	Trademark Royalty	
15	2005-12-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	14,085,750	Trademark Royalty	
16	2006-01-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	5,893,280	Trademark Royalty	
17	2006-02-28	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	6,009,730	Trademark Royalty	
18	2006-03-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	10,423,490	Trademark Royalty	
19	2006-04-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	12,345,840	Trademark Royalty	
20	2006-05-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	51,202,620	Trademark Royalty	
21	2006-06-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	16,053,750	Trademark Royalty	
22	2006-07-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	8,056,100	Trademark Royalty	
23	2006-08-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	4,278,750	Trademark Royalty	
24	2006-09-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	18,061,300	Trademark Royalty	
25	2006-10-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	16,136,200	Trademark Royalty	
26	2006-11-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	27,123,660	Trademark Royalty	EX-YOO-00166
27	2006-12-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	14,009,530	Trademark Royalty	



	2007-01-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	9,299,960	Trademark Royalty	
29	2007-02-28	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	7,826,740	Trademark Royalty	
30	2007-03-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	8,653,760	Trademark Royalty	
31	2007-04-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	7,570,790	Trademark Royalty	
32	2007-05-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	26,391,010	Trademark Royalty	
33	2007-06-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	25,950,290	Trademark Royalty	
34	2007-07-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	6,663,490	Trademark Royalty	
35	2007-08-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	5,038,300	Trademark Royalty	
36	2007-09-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	6,536,150	Trademark Royalty	
37	2007-10-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	9,726,070	Trademark Royalty	
38	2007-11-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	10,895,440	Trademark Royalty	
39	2007-12-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	6,088,730	Trademark Royalty	
40	2008-01-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	12,153,580	Trademark Royalty	
41	2008-02-28	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	11,259,250	Trademark Royalty	
42	2008-03-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	8,732,640	Trademark Royalty	
43	2008-04-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	10,783,200	Trademark Royalty	
44	2008-05-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	32,223,400	Trademark Royalty	
45	2008-06-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	33,200,100	Trademark Royalty	
46	2008-07-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	12,585,200	Trademark Royalty	
47	2008-08-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	10,737,000	Trademark Royalty	
48	2008-09-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	10,285,800	Trademark Royalty	
49	2008-10-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	13,589,300	Trademark Royalty	
50	2008-11-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	7,944,100	Trademark Royalty	
51	2008-12-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	5,803,300	Trademark Royalty	
52	2009-01-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	11,644,900	Trademark Royalty	
53	2009-02-28	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	11,370,700	Trademark Royalty	
54	2009-03-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	7,177,300	Trademark Royalty	
55	2009-04-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	15,194,700	Trademark Royalty	
56	2009-05-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	24,484,700	Trademark Royalty	EX-YOO-00167
57	2009-06-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	26,799,300	Trademark Royalty	

	2009-07-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	5,792,000	Trademark Royalty	
59	2009-08-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	10,084,100	Trademark Royalty	
60	2009-09-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	15,887,300	Trademark Royalty	
61	2009-10-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	10,802,500	Trademark Royalty	
62	2009-11-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	10,918,500	Trademark Royalty	
63	2009-12-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	7,395,500	Trademark Royalty	
64	2010-01-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	11,801,000	Trademark Royalty	
65	2010-02-28	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	10,850,700	Trademark Royalty	
66	2010-03-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	11,595,600	Trademark Royalty	
67	2010-04-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	5,401,000	Trademark Royalty	
68	2010-05-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	17,967,200	Trademark Royalty	
69	2010-06-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	27,702,900	Trademark Royalty	
70	2010-07-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	5,754,900	Trademark Royalty	
71	2010-08-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	6,560,100	Trademark Royalty	
72	2010-09-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	5,163,800	Trademark Royalty	
73	2010-10-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	7,554,100	Trademark Royalty	
74	2010-11-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	9,864,200	Trademark Royalty	
75	2010-12-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	6,094,700	Trademark Royalty	
76	2011-01-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	8,320,400	Trademark Royalty	
77	2011-02-28	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	9,563,800	Trademark Royalty	
78	2011-03-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	7,989,800	Trademark Royalty	
79	2011-04-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	10,001,200	Trademark Royalty	
80	2011-05-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	22,827,700	Trademark Royalty	
81	2011-06-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	18,034,200	Trademark Royalty	
82	2011-07-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	4,462,300	Trademark Royalty	
83	2011-08-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	6,423,500	Trademark Royalty	
84	2011-09-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	8,823,300	Trademark Royalty	
85	2011-10-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	11,656,900	Trademark Royalty	
86	2011-11-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	8,929,700	Trademark Royalty	
87	2011-12-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	6,463,100	Trademark Royalty	EX-YOO-00168

	2012-01-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	6,883,000	Trademark Royalty	
89	2012-02-29	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	9,087,000	Trademark Royalty	
90	2012-03-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	7,447,900	Trademark Royalty	
91	2012-04-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	9,262,100	Trademark Royalty	
92	2012-05-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	29,241,100	Trademark Royalty	
93	2012-06-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	30,682,600	Trademark Royalty	
94	2012-07-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	7,830,400	Trademark Royalty	
95	2012-08-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	5,237,900	Trademark Royalty	
96	2012-09-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	9,990,600	Trademark Royalty	
97	2012-10-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	9,395,500	Trademark Royalty	
98	2012-11-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	8,452,700	Trademark Royalty	
99	2012-12-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	4,746,800	Trademark Royalty	
100	2013-01-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	7,036,900	Trademark Royalty	
101	2013-02-28	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	8,484,600	Trademark Royalty	
102	2013-03-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	7,233,800	Trademark Royalty	
103	2013-04-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	8,916,600	Trademark Royalty	
104	2013-05-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	27,879,000	Trademark Royalty	
105	2013-06-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	28,853,000	Trademark Royalty	
106	2013-07-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	3,280,400	Trademark Royalty	
107	2013-08-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	4,723,200	Trademark Royalty	
108	2013-09-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	3,318,900	Trademark Royalty	
109	2013-10-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	8,013,700	Trademark Royalty	
110	2013-11-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	7,471,000	Trademark Royalty	
111	2013-12-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	5,376,300	Trademark Royalty	
112	2014-02-11	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	5,214,230	Trademark Royalty	
113	2014-03-11	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	SLPLUS	5,456,480	Trademark Royalty	
Total				KRW 1,879,571,760			

# ACCOUNTS OF CRIME (4)

NO.	DATE	PAYER	CEO	RECIPIENT	DAMAGES (Excluding VAT)	DETAILS	REMARKS
1	Around 2004	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	45,000,000	Design Consulting Service Fee	
2	Around 2005	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	60,000,000	Design Consulting Service Fee	
3	Around 2006	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	60,000,000	Design Consulting Service Fee	
4	Around 2007	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	60,000,000	Design Consulting Service Fee	
5	Around 2008	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	60,000,000	Design Consulting Service Fee	
6	Around 2009	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	18,666,000	Design Consulting Service Fee	
7	2009-04-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	3,000,000	Design Consulting Service Fee	
8	2009-05-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	3,000,000	Design Consulting Service Fee	
9	2009-06-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	3,000,000	Design Consulting Service Fee	
10	2009-07-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	3,000,000	Design Consulting Service Fee	
11	2009-08-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	3,000,000	Design Consulting Service Fee	
12	2009-09-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	3,000,000	Design Consulting Service Fee	
13	2009-10-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	3,000,000	Design Consulting Service Fee	
14	2009-11-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	3,000,000	Design Consulting Service Fee	
15	2009-12-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	3,000,000	Design Consulting Service Fee	
16	2010-01-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
17	2010-02-28	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
18	2010-03-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
19	2010-04-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
20	2010-05-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
21	2010-06-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
22	2010-07-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
23	2010-08-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
24	2010-09-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
25	2010-10-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
26	2010-11-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
27	2010-12-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
28	2011-01-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee EX-YOO-00170	

	2013-08-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
60	2013-09-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
61	2013-10-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
62	2013-11-30	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
63	2013-12-31	Dapanda Co., Ltd.	KIM Pil Bae SONG Guk-bin	MOREAL DESIGN	80,000,000	Design Consulting Service Fee	
Total				KRW 4,170,666,000			